

EPA REGISTRATION FILE No. 73801-1

# ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: <b>SEP 23 2009</b>		EPA Reg. Number: <b>73801 - R</b>		
	Check List Item	Yes	No	N/A
1	Has the <b>PRIA Fee been Paid</b> ; is a copy of the check or Pay.gov receipt included in the Submission Package?	X		
2	Is an <b>Application Form</b> (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	X		
3	Is a <b>Confidential Statement of Formula</b> (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	X		
4	Is a <b>Formulator's Exemption Statement</b> (EPA Form 8570-27) Included in the Submission Package?		X	
5	Is a <b>Certification with Respect to Citation of Data</b> (EPA Form 8570-34) Included in the Submission Package?	X		
6	Is a <b>Data Matrix</b> (EPA Form 8570-35) Included in the Submission Package?	X		
7	Is a <b>Label</b> Included in the Submission Package?	X		
8	Are <b>Data</b> Included in the Submission Package?	X		
9	Is the Submission an <b>Amendment</b> ?		X	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MAY 13 2011

Tagros Chemicals India, Ltd.  
c/o Jane Miller  
Biologic Inc.  
115 Obtuse Hill  
Brookfield, CT 06804

Subject: Application for Pesticide Amendment  
Deltamethrin Technical  
EPA Reg. No. 73801-1  
Your Submission Dated January 30, 2011  
Decision No: 446643

Dear Ms. Miller:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

If you have any questions contact Driss Benmhend at 703-308-9525 or by e-mail at: [Benmhend.driss@epa.gov](mailto:Benmhend.driss@epa.gov).

Sincerely,

*Mark S. Smith*

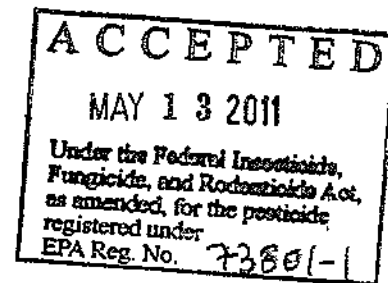
Mark Suarez  
Product Manager 13, Insecticide Branch  
Registration Division (7504P)

Enclosure  
Stamped label

(P)

# Deltamethrin Technical

## An Insecticide for Formulation Purposes Only



Active Ingredient:

Deltamethrin\*.....98.5%

Inert Ingredients:.....1.5%

TOTAL.....100.0%

\*(1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

### WARNING

FIRST AID	
If Swallowed:	Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person.
If Inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

Manufactured by:  
Tagros Chemicals India, Ltd.  
Jhaver Centre, Rajah Annamalai Building, 4<sup>th</sup> Floor  
72 Marshalls Road  
Egmore, Chennai  
600 008, India

EPA Reg. No. 73801-1  
EPA Est. No. 73801-IND-002

Net Weight: 25 kg (55.12 lbs.)  
50 kg (110.23 lbs.)

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours, without damage. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

### ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for the formulation into an insecticide for the following uses:

- 1) Bulb Vegetables, Cucurbit Vegetables, Fruiting Vegetables, Root Vegetables (except Sugarbeets), Tuberous and Corn Vegetables, Pome Fruits, Tree Nuts, Canola and Rapeseed, Cotton, Field Corn, Popcorn, Sweet Corn, Soybeans, Sorghum, and Sunflowers;
- 2) Domestic Indoor (household), Domestic Outdoor (lawns, perimeters, ornamentals), Commercial/Industrial/Institutional (indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (sod farms, golf courses, non-agricultural sites), various modes of transportation;
- 3) Stored grains for food, feed and oils;
- 4) Stored seeds [with stored grain tolerances -- wheat, barley, oats, rice and sorghum (milo)];
- 5) For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene from insulation at a rate of up to 1500 ppm active ingredient;

The finished board must have the following label:

*"Polystyrene foam [or Company trade name for foam] insulation contains Deltamethrin to [which will] protect the foam from termites and other wood destroying insects."*

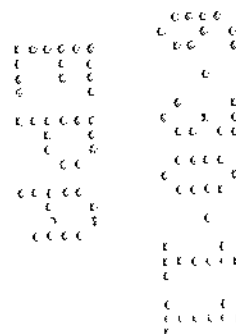
- 6) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 7) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

Do not contaminate water, food

**Pesticide Storage:** Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

**Container Handling:** Nonrefillable containers. Do not reuse or refill this container. **HDPE/Metal Drum with liner:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Tagros Chemicals India, Ltd. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Tagros Chemicals India, Ltd. To the extent consistent with applicable law, Tagros Chemicals India, Ltd. shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. TAGROS CHEMICALS INDIA, LTD. MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.





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WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

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c/o Jane Miller  
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MAY 13 2011

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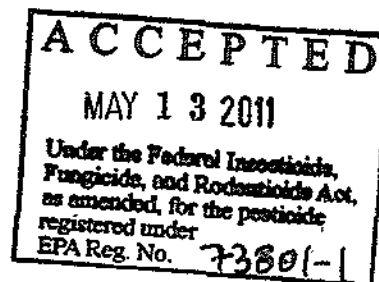
A handwritten signature in black ink, appearing to read "Mark Suarez", with a large, stylized flourish at the end.

Mark Suarez  
Product Manager 13, Insecticide Branch  
Registration Division (7504P)

Enclosure  
Stamped label

# Deltamethrin Technical

## An Insecticide for Formulation Purposes Only



### Active Ingredient:

Deltamethrin\*:.....98.5%  
Inert Ingredients:.....1.5%  
TOTAL.....100.0%

\*(1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

## WARNING

FIRST AID	
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<b>If Inhaled:</b>	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
<b>If on Skin or Clothing:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
<b>If in Eyes:</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
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### Manufactured by:

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Jhaver Centre, Rajah Annamalai Building, 4<sup>th</sup> Floor  
72 Marshalls Road  
Egmore, Chennai  
600 008, India

EPA Reg. No. 73801-1

EPA Est. No. 73801-IND-002

Net Weight: 25 kg (55.12 lbs.)  
50 kg (110.23 lbs.)



## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

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### **ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for the formulation into an insecticide for the following uses:

- 1) Bulb Vegetables, Cucurbit Vegetables, Fruiting Vegetables, Root Vegetables (except Sugarbeets), Tuberous and Corm Vegetables, Pome Fruits, Tree Nuts, Canola and Rapeseed, Cotton, Field Corn, Popcorn, Sweet Corn, Soybeans, Sorghum, and Sunflowers;
- 2) Domestic Indoor (household), Domestic Outdoor (lawns, perimeters, ornamentals), Commercial/Industrial/Institutional (indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (sod farms, golf courses, non-agricultural sites), various modes of transportation;
- 3) Stored grains for food, feed and oils;
- 4) Stored seeds [with stored grain tolerances – wheat, barley, oats, rice and sorghum (milo)];
- 5) For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene foam insulation at a rate of up to 1500 ppm active ingredient;

The finished board must have the following label:

*"Polystyrene foam [or Company trade name for foam] insulation contains Deltamethrin to [which will] protect the foam from termites and other wood destroying insects."*

- 6) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 7) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Nonrefillable containers. Do not reuse or refill this container. **HDPE/Metal Drum with liner:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**CONDITIONS OF SALE AND LIMITATION OF WARRANTY**

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### Wintering Downed and Dying

4 April - will send updated data matrix to include G.L.G. for time use  
from 264-1011 and 432-762

# Deltamethrin Technical

## An Insecticide for Formulation Purposes Only

~~This product is not intended for formulation into end use products with Terrestrial Food Crop Uses.~~

Active Ingredient:

Deltamethrin\*:.....98.5%

Inert Ingredients:.....1.5%

TOTAL.....100.0%

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### ENVIRONMENTAL HAZARDS

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### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

~~This product is not intended for formulation into end use products with Terrestrial Food Crop Uses.~~

Only for the formulation into an insecticide for the following uses:

- ~~1) In and around non food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation.~~
- 1) Bulb Vegetables, Cucurbit Vegetables, Fruiting Vegetables, Root Vegetables (except Sugarbeets), Tuberous and Corm Vegetables, Pome Fruits, Tree Nuts, Canola and Rapeseed, Cotton, Field Corn, Popcorn, Sweet Corn, Soybeans, Sorghum, and Sunflowers;
- 2) Domestic Indoor (household), Domestic Outdoor (lawns, perimeters, ornamentals), Commercial/Industrial/Institutional (indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (sod farms, golf courses, non-agricultural sites), various modes of transportation;
- 3) Stored grains for food, feed and oils;
- 4) Stored seeds [with stored grain tolerances – wheat, barley, oats, rice and sorghum (milo)];
- 5) For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene foam insulation at a rate of up to 1500 ppm active ingredient;

The finished board must have the following label:

"Polystyrene foam [or Company trade name for foam] insulation contains Deltamethrin to [which will] protect the foam from termites and other wood destroying insects."

- 6) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 7) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal Handling:** Nonrefillable containers. ~~HDPE Drums:~~ Do not reuse or refill this container. HDPE/Metal Drum with liner: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or ~~or reconditioning, or puncture and dispose of liner in a sanitary landfill, or by incineration,~~ or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. ~~Triple-rinse or pressure-rinse container (or equivalent) promptly after emptying. Triple-rinse as follows:~~

~~Containers larger than 5 gallons:~~ Empty the remaining contents into formulation equipment or a mix tank. Fill the container  $\frac{1}{4}$  full with water. Replace and tighten closures. Tip container on its side and roll back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

~~Pressure-rinse as follows:~~ Empty the remaining contents into formulation equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure-rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

#### CONDITIONS OF SALE AND LIMITATION OF WARRANTY

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[illegible]



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804	EPA Registration Number/File Symbol 7380f-1
Active Ingredient(s) and/or representative test compound(s) Deltamethrin	Date April 7, 2011
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food, Terrestrial Non-Food, Domestic Outdoor, Indoor	Product Name Deltamethrin Technical

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date April 7, 2011	Typed or Printed Name and Title Jane M. Miller, Agent
---------------	-----------------------	--



# Deltamethrin Technical

## An Insecticide for Formulation Purposes Only

~~This product is not intended for formulation into end-use products with Terrestrial Food Crop Uses.~~

Active Ingredient:

Deltamethrin\*:.....98.5%

Inert Ingredients:.....1.5%

TOTAL.....100.0%

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KEEP OUT OF REACH OF CHILDREN

### WARNING

FIRST AID	
<b>If Swallowed:</b>	Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person.
<b>If Inhaled:</b>	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
<b>If on Skin or Clothing:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
<b>If in Eyes:</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

**Manufactured by:**

Tagros Chemicals India, Ltd.

Jhaver Centre, Rajah Annamalai Building, 4<sup>th</sup> Floor

72 Marshalls Road

Egmore, Chennai

600 008, India

EPA Reg. No. 73801-1

EPA Est. No. 73861-IND-002

Net Weight: 25 kg ( 55.12 lbs.)

50 kg (110.23 lbs.)

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours, without damage. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

### ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

~~This product is not intended for formulation into end use products with Terrestrial Food Crop Uses.~~

Only for the formulation into an insecticide for the following uses:

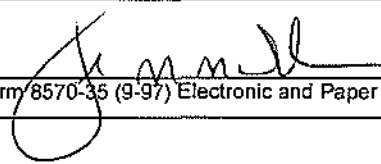
- ~~1) In and around non food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation.~~
- 1) Bulb Vegetables, Cucurbit Vegetables, Fruiting Vegetables, Root Vegetables (except Sugarbeets), Tuberous and Corm Vegetables, Pome Fruits, Tree Nuts, Canola and Rapeseed, Cotton, Field Corn, Popcorn, Sweet Corn, Soybeans, Sorghum, and Sunflowers;
- 2) Domestic Indoor (household), Domestic Outdoor (lawns, perimeters, ornamentals), Commercial/Industrial/Institutional (indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (sod farms, golf courses, non-agricultural sites), various modes of transportation;
- 3) Stored grains for food, feed and oils;
- 4) Stored seeds [with stored grain tolerances – wheat, barley, oats, rice and sorghum (milo)];
- 5) For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene from insulation at a rate of up to 1500 ppm active ingredient;

[illegible]

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**DATA MATRIX**

Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 1 of 10
Applicant's/Registrant's Name & Address			Product:		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1600	Description of Materials Used to Produce the Product	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1620	Description of Production Process	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1700	Preliminary Analysis	47866502	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1750	Certified Limits	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1800	Enforcement Analytical Method	47866502	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1900	Submittal of Samples				2
830.6302	Color	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6303	Physical State	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6304	Odor	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6313	Stability to normal & elevated temp., metal, metal ion	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6314	Oxidation/Reduction				3
830.6315	Flammability / Flame Extension				4
830.6316	Explosibility				5
Signature 			Name and Title Jane M. Miller, Agent		Date 01/05/2011

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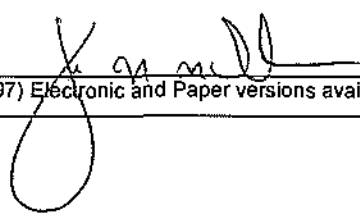
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Submission*

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Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRIO Number	Submitter	Status	Note
830.6317	Storage Stability	CITE-ALL		Pay	
830.6319	Miscibility				6
830.6320	Corrosion Characteristics	CITE-ALL		Pay	
830.6321	Dielectric Breakdown Voltage				7
830.7000	pH	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7050	UV/Visible Spectrum	47866503	TAGRDS CHEMICALS INDIA, LTD.	Own	
830.7100	Viscosity				8
830.7200	Melting Point/ Melting Range	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7300	Density	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7370	Dissociation Constant				9
830.7570	Octanol/Water Partition Coefficient	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7840/60	Water Solubility	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7950	Vapor Pressure	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
Signature			Name and Title	Date	
			Jane M. Miller, Agent	01/05/2011	

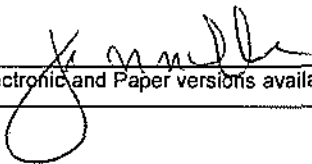
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Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804		Deltamethrin Technical			
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Remaining data requirements including Acute Toxicity, Ecological Effects, Environmental Fate, and all other generic data requirements required for the addition of Agricultural uses, including task forces.		CITE-ALL	Bonide Products Inc.	Pay	
			Salem, VA		
			Senoret Chemical Co.	Pay	
			Silver Springs, MD		
			Bayer Environmental Science	Pay	
			Research Triangle Park, NC		
			Chase Products	Pay	
			Maywood, IL		
			Spray Drift Task Force	Pay	
			Washington, DC		
		Whitmire Micro-Gen	Pay		
		St. Louis, MO			
Signature			Name and Title		Date
			Jane M. Miller, Agent		01/05/2011

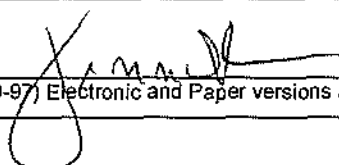
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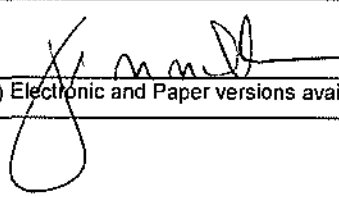
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Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Value Gardens Supply	Pay	
			Saint Joseph, MO		
			Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Southern Agricultural Insecticides	Pay	
			Palmetto, FL		
			The Scotts Company	Pay	
			Marysville, OH		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			Green Light Company	Pay	
			Walnut Creek, CA		
			Zep Manufacturing Co.	Pay	
			Atlanta, GA		
			Bacon Products Co.	Pay	
			Chattanooga, TN		
Signature			Name and Title		Date
			Jane M. Miller, Agent		01/05/2011

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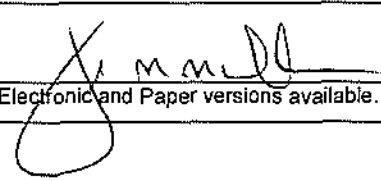
Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 5 of 10
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Residential Exposure Joint Venture	Pay	
			Washington, DC		
			Boehringer Ingelheim Vetmedica	Pay	
			Elwood, KS		
			S.C. Johnson & Son	Pay	
			Racine, WI		
			Voluntary Purchasing Group	Pay	
			Plano, TX		
			J.J. Mauget Co.	Pay	
			Woodbridge, VA		
			The Andersons Lawn Fertilizer Div	Pay	
			Maumee, OH		
			AMREP Inc.	Pay	
			Marietta, GA		
			Apollo Industries Inc.	Pay	
			Smyrna, GA		
Signature			Name and Title		Date
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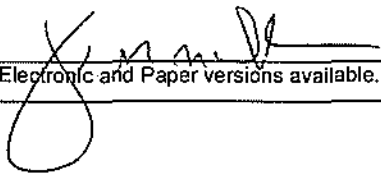
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Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. t15 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Speer Products Inc.	Pay	
			Memphis, TN		
			Rainbow Technology Corp.	Pay	
			Greeley, CO		
			FIFRA Endangered Species T F	Pay	
			Washington, DC		
			Hoechst Schering Agrevo	Pay	
			Research Triangle Park, NC		
			Aerochem Inc.	Pay	
			Raymond, MS		
			Mystic Chemical Products	Pay	
			Cleveland, OH		
			P.F. Harris Manufacturing Co	Pay	
			Plano, TX		
			Bayer Cropscience LP	Pay	
			RTP, NC		
Signature			Name and Title		Date
			Jane M. Miller, Agent		01/05/2011

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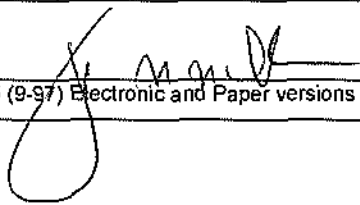
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Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804		Deltamethrin Technical			
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Safer Inc.	Pay	
			Lilitz, PA		
			Quest Chemocal Corp.	Pay	
			Houston, TX		
			CTX-Cenol Inc.	Pay	
			Miami, FL		
			K-G Packaging Inc.	Pay	
			Hartford, WI		
			Walla Walla Environmental Inc.	Pay	
			Walla Walla, WA		
			Arysta Lifescience North America	Pay	
			Cary, NC		
			Hedley Technologies, USA, Inc.	Pay	
			Grand Junction, CO		
			Bugg Products LLC	Pay	
			Plymouth, MN		
Signature			Name and Title		Date
			Jane M. Miller, Agent		01/05/2011

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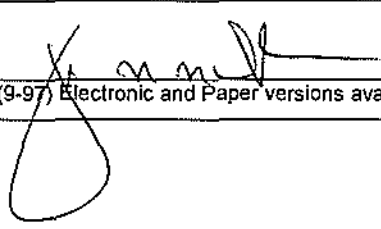
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Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Bengal Products, Inc.	Pay	
			Baton Rouge, LA		
			Excel Marketing	Pay	
			Salem, VA		
			Outdoor Residential Exposure TF	Pay	
			Washington, OC		
			Star Horse Products Inc.	Pay	
			Goodyear, AZ		
			Valent Biosciences Corp.	Pay	
			Libertyville, IL		
			Non-Dietary Exposure Task Force	Pay	
			Washington, DC		
			Black Flag Brands	Pay	
			Bedford Heights, OH		
Signature			Name and Title		Date
			Jane M. Miller, Agent		01/05/2011

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Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		FMC Corp	Pay	
			Philadelphia, PA		
			E.I. Du Pont De Nemours and Co.	Pay	
			Wilmington, DE		
			Waterbury Companies	Pay	
			Independence, LA		
			Phaelon Corp.	Pay	
			Salem, VA		
			Lawson Products Inc.	Pay	
			Des Plaines, IL		
			Zep Commercial Sales	Pay	
			Atlanta, GA		
			Control Solutions, Inc.	Pay	
			Cub Run, KY		
			Pyrethroid Working Group	PAY	
			Washington, DC		
Signature			Name and Title	Date	
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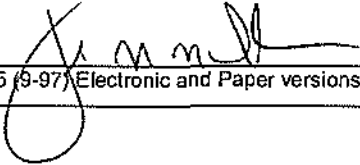
### DATA MATRIX FOOTNOTES

1. **Description of Formulation Process:** Not applicable because the product is a TGA/MP.
2. **Submittal of Samples:** Not required at this time.
3. **Oxidation/Reduction:** Not applicable. Product does not contain oxidizing or reducing agents.
4. **Flammability / Flame Extension:** Not applicable. Product does not contain combustible liquids.
5. **Explosibility:** Not applicable. Product is not potentially explosive.
6. **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
7. **Dielectric Breakdown Voltage:** Not applicable. Product is not intended for use around electrical equipment.
8. **Viscosity:** Not required because product is a solid.
9. **Dissociation Constant:** Not required since there is no acidic or basic functionality in the Deltamethrin molecule. The measurement of pKa is only applicable to molecules which have an acid group (carboxylate, phenol or phosphoric acid for example) or basic group (amine). None of the methrin compounds fall into this class being neutral molecules.

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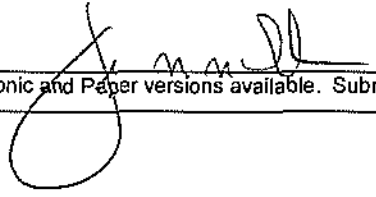
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Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			TAGRDS CHEMICALS INDIA, LTD.	Dwn	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					1
			TAGROS CHEMICALS INDIA, LTD.	Dwn	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					2
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Dwn	
					3
					4
					5
Signature			Name and Title	Date	
			Jane M. Miller, Agent	01/05/2011	

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Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				Pay	
					6
				Pay	
					7
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					8
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					9
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
Signature			Name and Title		Date
			Jane M. Miller, Agent		01/05/2011

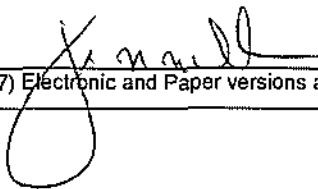
Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Public File Copy

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**WASHINGTON, D.C. 20460**

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**DATA MATRIX**

Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 3 of 10
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Bonide Products Inc.	Pay	
			Salem, VA		
			Senoret Chemical Co.	Pay	
			Silver Springs, MD		
			Bayer Environmental Science	Pay	
			Research Triangle Park, NC		
			Chase Products	Pay	
			Maywood, IL		
			Spray Drift Task Force	Pay	
			Washington, DC		
			Whitmire Micro-Gen	Pay	
			St. Louis, MO		
Signature 			Name and Title		Date
			Jane M. Miller, Agent		01/05/2011

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

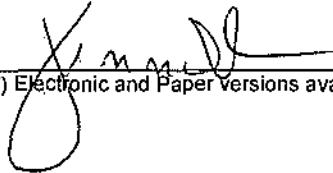
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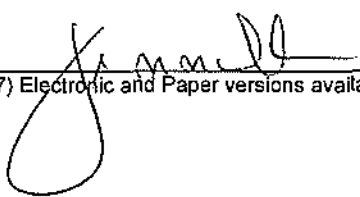
**DATA MATRIX**

Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 4 of 10
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Value Gardens Supply	Pay	
			Saint Joseph, MO		
			Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Southern Agricultural Insecticides	Pay	
			Palmetto, FL		
			The Scotts Company	Pay	
			Marysville, OH		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			Green Light Company	Pay	
			Walnut Creek, CA		
			Zep Manufacturing Co.	Pay	
			Atlanta, GA		
			Bacon Products Co.	Pay	
			Chattanooga, TN		
Signature 			Name and Title Jane M. Miller, Agent		Date 01/05/2011

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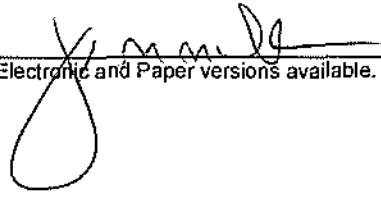
**DATA MATRIX**

Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 5 of f0
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Residential Exposure Joint Venture	Pay	
			Washington, DC		
			Boehringer Ingelheim Vetmedica	Pay	
			Elwood, KS		
			S.C. Johnson & Son	Pay	
			Racine, WI		
			Voluntary Purchasing Group	Pay	
			Plano, TX		
			J.J. Mauget Co.	Pay	
			Woodbridge, VA		
			The Andersons Lawn Fertilizer Div	Pay	
			Maumee, OH		
			AMREP Inc.	Pay	
			Marietta, GA		
			Apollo Industries Inc.	Pay	
			Smyrna, GA		
Signature 			Name and Title Jane M. Miller, Agent		Date 01/05/2011

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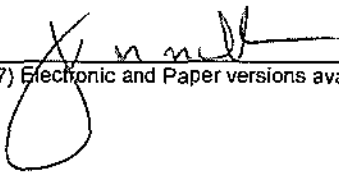
**DATA MATRIX**

Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 6 of 10
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Speer Products Inc.	Pay	
			Memphis, TN		
			Rainbow Technology Corp.	Pay	
			Greeley, CO		
			FIFRA Endangered Species T F	Pay	
			Washington, DC		
			Hoechst Schering Agrevo	Pay	
			Research Triangle Park, NC		
			Aerochem Inc.	Pay	
			Raymond, MS		
			Mystic Chemical Products	Pay	
			Cleveland, OH		
			P.F. Harris Manufacturing Co	Pay	
			Plano, TX		
			Bayer Cropscience LP	Pay	
			RTP, NC		
Signature 			Name and Title Jane M. Miller, Agent		Date 01/05/2011

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**DATA MATRIX**

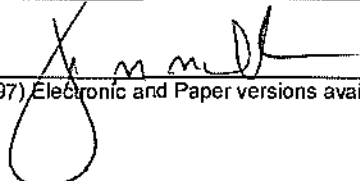
Date January 5, 2011			EPA Reg. No./File Symbol 73801-f		Page 7 of 10
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Safer Inc.	Pay	
			Lilitz, PA		
			Quest Chemocal Corp.	Pay	
			Houston, TX		
			CTX-Cenol Inc.	Pay	
			Miami, FL		
			K-G Packaging Inc.	Pay	
			Hartford, WI		
			Walla Walla Environmental Inc.	Pay	
			Walla Walla, WA		
			Arysta Lifescience North America	Pay	
			Cary, NC		
			Hedley Technologies, USA, Inc.	Pay	
			Grand Junction, CO		
			Bugg Products LLC	Pay	
			Plymouth, MN		
Signature 			Name and Title Jane M. Miller, Agent		Date 01/05/2011



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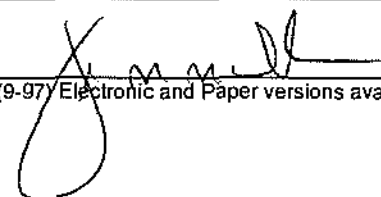
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Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 8 of 10
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Bengal Products, Inc.	Pay	
			Baton Rouge, LA		
			Excel Marketing	Pay	
			Salem, VA		
			Outdoor Residential Exposure TF	Pay	
			Washington, DC		
			Star Horse Products Inc.	Pay	
			Goodyear, AZ		
			Valent Biosciences Corp.	Pay	
			Libertyville, IL		
			Non-Dietary Exposure Task Force	Pay	
			Washington, DC		
			Black Flag Brands	Pay	
			Bedford Heights, OH		
Signature 			Name and Title Jane M. Miller, Agent		Date 01/05/2011

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Date January 5, 2011			EPA Reg. No./File Symbol 73801-1		Page 9 of 10
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			FMC Corp	Pay	
			Philadelphia, PA		
			E.I. Du Pont De Nemours and Co.	Pay	
			Wilmington, DE		
			Waterbury Companies	Pay	
			Independence, LA		
			Phaeton Corp.	Pay	
			Salem, VA		
			Lawson Products Inc.	Pay	
			Des Plaines, IL		
			Zep Commercial Sales	Pay	
			Atlanta, GA		
			Control Solutions, Inc.	Pay	
			Cub Run, KY		
			Pyrethroid Working Group	PAY	
			Washington, DC		
Signature 			Name and Title Jane M. Miller, Agent		Date 01/05/2011



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 73801-1	2. EPA Product Manager M. Suarez	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Deltamethrin Technical	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is an amendment to add crop and non-crop use sites to the label. This action will not fall within PRIA.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Jarte M. Miller		Title Agent	
		Telephone No. (Include Area Code) (203) 740-1200	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Jarte M. Miller		5. Date January 30, 2011	

January 30, 2011

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Room S-4900, 4<sup>th</sup> Floor  
Arlington, VA 22202

Attention: Mr. Mark Suarez (PM #13)  
RE: Deltamethrin Technical; EPA Reg. No. 73801-1  
Application for Pesticide Amendment  
Label Amendment to add uses

Dear Mr. Suarez:

On behalf of Tagros Chemicals India, Ltd. we are submitting an Application for Pesticide Amendment for the above mentioned product. The purpose of this amendment action is to add crop and non-crop uses to its label. These use sites are identical as those that appear on "Decis 1.5 EC", EPA Reg. No. 264-1011 and "Delta Technical", EPA Reg. No. 432-762.

The following documents are enclosed to process this label amendment:

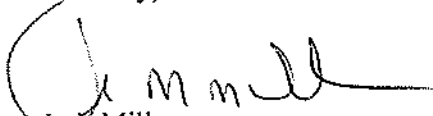
1. Application for Pesticide Amendment (8570-1)
2. Data Matrix (EPA Form 8570-35)
3. Three (3) copies of revised labeling with the deleted text lined out and the new text underlined.

To satisfy any additional data requirements, Tagros Chemicals India is using the cite-all option and has sent offer to pay letters to those companies appearing on the EPA Data Submitters List.

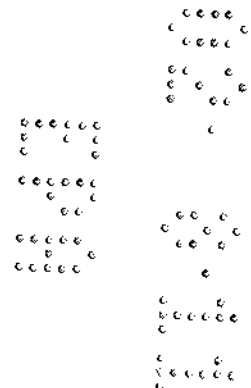
This action will not fall within PRIA and should be completed in 90 days.

Should you have any questions, or wish to reach me, please feel free to contact our office at 203-740-1200.

Sincerely,



Jane Miller  
Agent to Tagros Chemicals India, Ltd.





# Deltamethrin Technical

## An Insecticide for Formulation Purposes Only

~~This product is not intended for formulation into end-use products with Terrestrial Food Crop Uses.~~

Active Ingredient:

Deltamethrin\*:.....98.5%

Inert Ingredients:.....1.5%

TOTAL.....100.0%

\*(1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

### WARNING

FIRST AID	
<b>If Swallowed:</b>	Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person.
<b>If Inhaled:</b>	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
<b>If on Skin or Clothing:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
<b>If in Eyes:</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

#### Manufactured by:

Tagros Chemicals India, Ltd.  
Jhaver Centre, Rajah Annamalai Building, 4<sup>th</sup> Floor  
72 Marshalls Road  
Egmore, Chennai  
600 008, India

EPA Reg. No. 73801-1

EPA Est. No. 73801-IND-002

Net Weight: 25 kg ( 55.12 lbs.)

50 kg (110.23 lbs.)

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours, without damage. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

### ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

~~This product is not intended for formulation into end use products with Terrestrial Food Crop Uses.~~

Only for the formulation into an insecticide for the following uses:

- ~~1) In and around non food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation.~~
- 1) Bulb Vegetables, Cucurbit Vegetables, Fruiting Vegetables, Root Vegetables (except Sugarbeets), Tuberous and Corm Vegetables, Pome Fruits, Tree Nuts, Canola and Rapeseed, Cotton, Field Corn, Popcorn, Sweet Corn, Soybeans, Sorghum, and Sunflowers;
- 2) Domestic Indoor (household), Domestic Outdoor (lawns, perimeters, ornamentals), Commercial/Industrial/Institutional (indoor and outdoor), Food Handling Establishments (edible product areas), Terrestrial Non-Food (sod farms, golf courses, non-agricultural sites), various modes of transportation;
- 3) Stored grains for food, feed and oils;
- 4) Stored seeds [with stored grain tolerances – wheat, barley, oats, rice and sorghum (milo)];
- 5) For use in the manufacture of polystyrene foam insulation to protect it from termites and other wood destroying insects. For best results, Deltamethrin Technical should be incorporated into the polystyrene from insulation at a rate of up to 1500 ppm active ingredient;

The finished board must have the following label:

"Polystyrene foam [or Company trade name for foam] insulation contains Deltamethrin to [which will] protect the foam from termites and other wood destroying insects."

- 6) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 7) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal Handling:** Nonrefillable containers. ~~HDPE Drums:~~ Do not reuse or refill this container. HDPE/Metal Drum with liner: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or reconditioning, or puncture and dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Triple-rinse or pressure-rinse container (or equivalent) promptly after emptying. Triple-rinse as follows:

~~Containers larger than 5 gallons:~~ Empty the remaining contents into formulation equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

~~Pressure-rinse as follows:~~ Empty the remaining contents into formulation equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure-rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

#### CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Tagros Chemicals India, Ltd. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Tagros Chemicals India, Ltd. To the extent consistent with applicable law, Tagros Chemicals India, Ltd. shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such

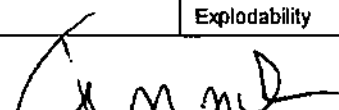
[illegible]

A collection of 20 small, stylized line drawings of various insects, including beetles, flies, and bees, arranged in a grid-like pattern.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
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**WASHINGTON, D.C. 20460**

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**DATA MATRIX**

Date March 31, 2011		EPA Reg. No./File Symbol 73801-1		Page 1 of 11	
Applicant's/Registrant's Name & Address		Product:			
Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804		Deltamethrin Technical			
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1600	Description of Materials Used to Produce the Product	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1620	Description of Production Process	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1700	Preliminary Analysis	47866502	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1750	Certified Limits	47866501	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1800	Enforcement Analytical Method	47866502	TAGROS CHEMICALS INDIA, LTD.	Own	
830.1900	Submittal of Samples				2
830.6302	Color	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6303	Physical State	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6304	Odor	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6313	Stability to normal & elevated temp., metal, metal ion	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.6314	Oxidation/Reduction				3
830.6315	Flammability / Flame Extension				4
830.6316	Explosibility				5
Signature 			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

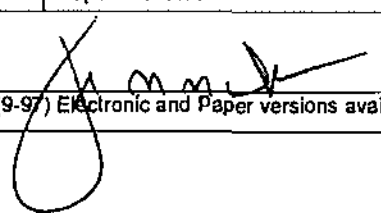
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**DATA MATRIX**

Date March 31, 2011			EPA Reg. No./File Symbol 73801-1		Page 2 of 11
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability	CITE-ALL		Pay	
830.6319	Miscibility				6
830.6320	Corrosion Characteristics	CITE-ALL		Pay	
830.6321	Dielectric Breakdown Voltage				7
830.7000	pH	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7050	UV/Visible Spectrum	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7100	Viscosity				8
830.7200	Melting Point/ Melting Range	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7300	Density	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7370	Dissociation Constant				9
830.7570	Octanol/Water Partition Coefficient	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7840/60	Water Solubility	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
830.7950	Vapor Pressure	47866503	TAGROS CHEMICALS INDIA, LTD.	Own	
Signature			Name and Title		Date
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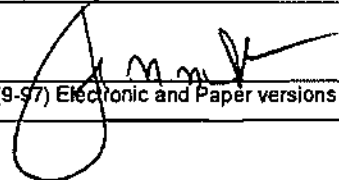
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## DATA MATRIX

Date March 31, 2011		EPA Reg. No./File Symbol 73801-1		Page 3 of 11	
Applicant's/Registrant's Name & Address		Product:			
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804		Deltamethrin Technical			
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1300 (171-4(b))	Nature of Residue in Livestock	CITE-ALL		Pay	
860.1480 (171-4(j))	Magnitude of Residue in Meat, Milk, Poultry and Eggs	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Vegetables, Root & Tuber, Crop Group 1	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Tuberos & Corn Vegetables Subgroup 1C & 1D	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Leaves of Root & Tuber, Crop Group 2	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Vegetables, Bulb, Crop Group 3	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Vegetables, Legumes, Crop Group 6	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Vegetables, Foliage of Legume (except soybean), Crop Group 7A	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Vegetables, Fruiting, Crop Group 8	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Vegetables, Cucurbit, Group 9	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Fruits, Pome, Crop Group 11	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of Residue in Plants - Tree Nuts, Crop Group 14	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Grain, Cereal, Crop Group 15	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Oilseed Crop Group 20	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Corn (field, seed, silage, sweet and pop)	CITE-ALL		Pay	
860.1500 (171-4(k))	Magnitude of the Residue in Plants - Cotton	CITE-ALL		Pay	
Signature			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

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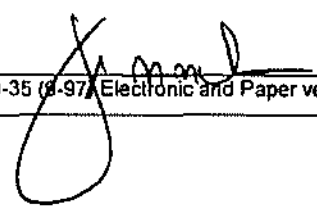


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Date March 31, 2011			EPA Reg. No./File Symbol 73801-1		Page 4 of 11
Applicant's/Registrant's Name & Address			Product:		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRIQ Number	Submitter	Status	Note
Remaining data requirements including Ecological Effects, Environmental Fate, and any other generic data requirements required for the addition of Agricultural uses, including task forces.		CITE-ALL	Bonide Products Inc.	Pay	
			Salem, VA		
			Senoret Chemical Co.	Pay	
			Silver Springs, MO		
			Bayer Environmental Science	Pay	
			Research Triangle Park, NC		
			Chase Products	Pay	
			Maywood, IL		
			Spray Drift Task Force	Pay	
			Washington, DC		
		Whitmire Micro-Gen	Pay		
		St. Louis, MO			
Signature 			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

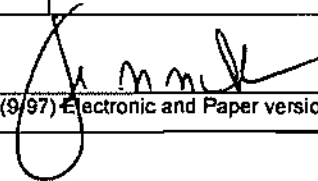
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Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Value Gardens Supply	Pay	
			Saint Joseph, MO		
			Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Southern Agricultural Insecticides	Pay	
			Palmetto, FL		
			The Scotts Company	Pay	
			Marysville, OH		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			Green Light Company	Pay	
			Walnut Creek, CA		
			Zep Manufacturing Co.	Pay	
			Atlanta, GA		
			Bacon Products Co.	Pay	
			Chattanooga, TN		
Signature 			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

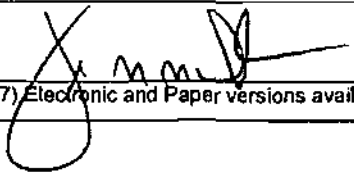
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Applicant's/Registrant's Name & Address		Product			
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804		Deltamethrin Technical			
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Residential Exposure Joint Venture	Pay	
			Washington, DC		
			Boehringer Ingelheim Vetmedica	Pay	
			Elwood, KS		
			S.C. Johnson & Son	Pay	
			Racine, WI		
			Voluntary Purchasing Group	Pay	
			Plano, TX		
			J.J. Mauget Co.	Pay	
			Woodbridge, VA		
			The Andersons Lawn Fertilizer Div	Pay	
			Maumee, OH		
			AMREP Inc.	Pay	
			Marietta, GA		
			Apollo Industries Inc.	Pay	
			Smyrna, GA		
Signature			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

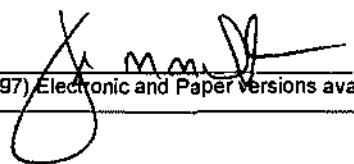
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Date March 31, 2011			EPA Reg. No./File Symbol 73801-I		Page 7 of 11
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Speer Products Inc.	Pay	
			Memphis, TN		
			Rainbow Technology Corp.	Pay	
			Greeley, CO		
			FIFRA Endangered Species T F	Pay	
			Washington, DC		
			Hoechst Schering Agrevo	Pay	
			Research Triangle Park, NC		
			Aerochem Inc.	Pay	
			Raymond, MS		
			Mystic Chemical Products	Pay	
			Cleveland, OH		
			P.F. Harris Manufacturing Co	Pay	
			Plano, TX		
			Bayer Cropscience LP	Pay	
			RTP, NC		
Signature			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

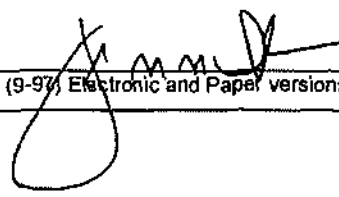
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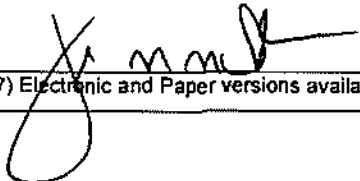
Date March 31, 2011			EPA Reg. No./File Symbol 73801-1		Page 8 of 11
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Safer Inc.	Pay	
			Lilitz, PA		
			Quest Chemocal Corp.	Pay	
			Houston, TX		
			CTX-Cenot Inc.	Pay	
			Miami, FL		
			K-G Packaging Inc.	Pay	
			Hartford, WI		
			Walla Walla Environmental Inc.	Pay	
			Walla Walla, WA		
			Arysta Lifescience North America	Pay	
			Cary, NC		
			Hedley Technologies, USA, Inc.	Pay	
			Grand Junction, CO		
			Bugg Products LLC	Pay	
			Plymouth, MN		
Signature			Name and Title		Date
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Date March 31, 2011		EPA Reg. No./File Symbol 73801-1		Page 9 of 11	
Applicant's/Registrant's Name & Address		Product			
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804		Deltamethrin Technical			
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Bengal Products, Inc.	Pay	
			Baton Rouge, LA		
			Excel Marketing	Pay	
			Salem, VA		
			Outdoor Residential Exposure TF	Pay	
			Washington, DC		
			Star Horse Products Inc.	Pay	
			Goodyear, AZ		
			Valent Biosciences Corp.	Pay	
			Libertyville, IL		
			Non-Dietary Exposure Task Force	Pay	
			Washington, DC		
			Black Flag Brands	Pay	
			Bedford Heights, OH		
			Pyrethroid Working Group	Pay	
			Washington, DC		
Signature			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

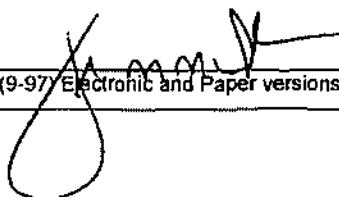
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Date March 31, 2011			EPA Reg. No./File Symbol 73801-t		Page 10 of 11
Applicant's/Registrant's Name & Address			Product		
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Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		FMC Corp	Pay	
			Philadelphia, PA		
			E.I. Du Pont De Nemours and Co.	Pay	
			Wilmington, DE		
			Waterbury Companies	Pay	
			Independence, LA		
			Phaeton Corp.	Pay	
			Salem, VA		
			Lawson Products Inc.	Pay	
			Des Plaines, IL		
			Zep Commercial Sales	Pay	
			Atlanta, GA		
			Control Solutions, Inc.	Pay	
			Cub Run, KY		
Signature			Name and Title		Date
			Jane M. Miller, Agent		03/31/2011

**DATA MATRIX FOOTNOTES**

1. **Description of Formulation Process:** Not applicable because the product is a TGA/MP.
2. **Submittal of Samples:** Not required at this time.
3. **Oxidation/Reduction:** Not applicable. Product does not contain oxidizing or reducing agents.
4. **Flammability / Flame Extension:** Not applicable. Product does not contain combustible liquids.
5. **Explosibility:** Not applicable. Product is not potentially explosive.
6. **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
7. **Dielectric Breakdown Voltage:** Not applicable. Product is not intended for use around electrical equipment.
8. **Viscosity:** Not required because product is a solid.
9. **Dissociation Constant:** Not required since there is no acidic or basic functionality in the Deltamethrin molecule. The measurement of pKa is only applicable to molecules which have an acid group (carboxylate, phenol or phosphoric acid for example) or basic group (amine). None of the methrin compounds fall into this class being neutral molecules.



# Deltamethrin Technical

**This product is not intended for formulation into end use products with Terrestrial Food Crop Uses.**

**Active Ingredient:**

Deltamethrin\*:.....98.5%

Inert Ingredients:.....1.5%

TOTAL.....	100.0%
------------	--------

\* (1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

## WARNING

<b>FIRST AID</b>	
<b>If Swallowed:</b>	Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person.
<b>If Inhaled:</b>	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
<b>If on Skin or Clothing:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
<b>If in Eyes:</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours, without damage. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

### **ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**This product is not intended for formulation into end use products with Terrestrial Food Crop Uses.**

Only for the formulation into an insecticide for the following uses:

- 1) In and around non-food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation.
- 2) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable containers. HDPE Drums: Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Triple rinse as follows:

**Containers larger than 5 gallons:** Empty the remaining contents into formulation equipment a mix tank. Fill the container  $\frac{1}{4}$  full with water. Replace and tighten closures. Tip container on its side and roll back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end

and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

**Pressure rinse as follows:** Empty the remaining contents into formulation equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

#### **CONDITIONS OF SALE AND LIMITATION OF WARRANTY**

Tagros Chemicals India, Ltd. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Tagros Chemicals India, Ltd. To the extent consistent with applicable law, Tagros Chemicals India, Ltd. shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. TAGROS CHEMICALS INDIA, LTD. MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

EPA Reg. No. 73801-1

EPA Est. No. 73801-IND-002

Net Weight:

Manufactured by:  
Tagros Chemicals India, Ltd.  
Jhaver Centre, Rajah Annamalai Building, 4<sup>th</sup> Floor  
72 Marshalls Road  
Egmore, Chennai  
600 008, India



(a jhaver group company)

**Tagros Chemicals India Ltd.**

"Jhaver Centre" Rajah Annamalai Building  
IV Floor, 72, Marshalls Road,  
Egmore, Chennai 600 008, India.  
Board : +91 44 4200 7400  
Direct : +91 44 4200 7415  
Fax : +91 44 2858 7873  
Email : [Info@tagros.com](mailto:Info@tagros.com)  
Web : [www.tagros.com](http://www.tagros.com)

DATE: 10<sup>th</sup> December 2010

Ms. Kathleen O'Malley  
7502C  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

RE: Tagros Chemical India, Ltd.  
EPA Company Number 73801  
Change of Agent

SENT VIA FAX: 703-305-7670

Dear Ms. O'Malley:

With this letter and in accordance with 40 C.F.R. Subpart C, Part 152.50(b)(3), Tagros Chemical India, Ltd. is notifying the Agency of its designated agent for the above company number. Please note the following name, address, phone/fax numbers and email of our designated agent:

Lawrence A. Miller and/or Jane M. Miller  
BIOLOGIC, Inc.  
115 Obtuse Hill Road  
Brookfield, CT 06804

Tel: 203-740-1200  
Fax: 203-740-1220

Email: [lmiller@biologicconsulting.com](mailto:lmiller@biologicconsulting.com)  
[jmiller@biologicconsulting.com](mailto:jmiller@biologicconsulting.com)

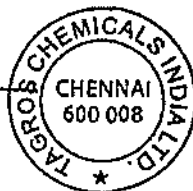
We kindly request that you take appropriate actions to make the change with effect from the date of this letter.

Thank you for your cooperation and please let me know if you need any additional information to process this request.

Sincerely,

For Tagros Chemicals India Limited,


Dr. Shahabuddin  
GM - R&D and Regulatory Affairs



Works : A-4 / 1, 2 & 3, Sipcot Industrial Complex, Kudikadu, Cuddalore - 607 005, Tamil Nadu  
Phone : +91 -04142 -239373, 239374 Fax : +91 - 04142 - 239375

Liaison Office : Western India House, 11, Sir. P.M. Road, Fort, Mumbai - 400 001  
Phone : +91-022-22831178 Telefax : +91-022-22831178 E mail : [krishna@tagros.com](mailto:krishna@tagros.com)



RE: Are you the agent for Tagros Chemicals India, Ltd. (EPA company number 73801)? 

Teresa Downs to: Jane Miller

12/09/2010 12:56 PM

Hi, Jane,

Yes, please have them email me a letter. The current (undeliverable) address is for another US agent, so we need documentation in order to update our database. I did not find such a letter in the jacket for their registration.

Teresa Downs  
Information Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
phone: (703)305-5363  
fax: (703)305-7670  
www.epa.gov/pesticides

"Jane Miller"

Yes we are. Not sure if they provided a letter wh...

12/09/2010 12:33:16 PM

From: "Jane Miller" <jmiller@biologicconsulting.com>  
To: Teresa Downs/DC/USEPA/US@EPA  
Date: 12/09/2010 12:33 PM  
Subject: RE: Are you the agent for Tagros Chemicals India, Ltd. (EPA company number 73801)?

Yes we are. Not sure if they provided a letter when we submitted their application for registration. I can have them get one to you.

Best Regards,

Jane M. Miller  
BIOLOGIC, Inc.  
115 Obtuse Hill Road  
Brookfield, CT 06804

Tel: 203-740-1200  
Fax: 203-740-1220

-----Original Message-----

From: Downs.Teresa@epamail.epa.gov [mailto:Downs.Teresa@epamail.epa.gov]  
Sent: Thursday, December 09, 2010 9:02 AM  
To: jmiller@biologicconsulting.com  
Subject: Are you the agent for Tagros Chemicals India, Ltd. [EPA company number 73801)?

Good morning, Jane,

Our mailing of the 2011 maintenance fee package for this company was returned to us as undeliverable. I looked through the jacket for registration 73801-1, but was not able to locate a letter from the company authorizing you to act as their agent.

Teresa Downs  
Information Services Branch  
Office of Pesticide Programs



# Typographical Error

Lawrence A. Miller o Shyam Mathur

11/05/2010 04:04 PM

Cc: Olga Odiott, "Rao", meenu, "drshahabuddin"

Dear Shyam:

Tagros noted a typographical error in your chemistry review of their deltamethrin technical product (see attached .pdf file). As you can see, I have highlighted the word "amitraz", which should read "deltamethrin". Can you please note this correction. Thank you.

Best Regards,

Larry -

Lawrence A. Miller  
BIOLOGIC, Inc.  
115 Obtuse Hill Road  
Brookfield, CT 06804

Tel: (203) 740-1200  
Fax: (203) 740-1220  
Email: [lmiller@biologicconsulting.com](mailto:lmiller@biologicconsulting.com)

CONFIDENTIALITY STATEMENT: This electronic message contains information that may be confidential or privileged. The information is intended solely for the use of the individual(s) or entity(ies) named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this email in error, please notify us immediately by telephone at 203-740-1200 or by email reply and delete this message. Thank you.



OneTouch Nov 05, 2010 (4).PDF

# FEE

DP BARCODE: D371051; FILE SYMBOL No.: 73801-R; PRODUCT: Deltamethrin Technical

Date: March 15, 2010

SUBJECT: Product Chemistry Review of Deltamethrin Technical TGAI / MUP

FROM: Shyam B. Mathur, PhD  
Product Chemistry Team Leader  
Technical Review Branch/RD (7505P)

*Shyam B. Mathur*  
3715710

TO: Olga Odiott / Richard Gebken, RM 13  
Insecticide Branch / RD (7505P)

*OR*

DP BARCODE: D371051  
DECISION No.: 420682  
File Symbol No.: 73801-R  
PRODUCT: Deltamethrin technical TGAI / MUP  
PCC: 097805  
REGISTRANT: Tagros Chemicals India Limited  
USE: Insecticide  
FOOD USE: No

## INTRODUCTION:

The registrant Tagros Chemicals India Limited has submitted a "me-too" registration application for 98.50% Deltamethrin TGAI/MUP. The deltamethrin technical TGAI / MUP is produced by Tagros Chemicals India Ltd., at Madras in India. In support of the application, the registrant has submitted 830 series group A and group B data with MRID Nos. 478665-01 through 478665-03, CSF for basic formulation (dated 09-15-09) and the product label. A corrected basic CSF (dated 09-15-09) was submitted on March 5, 2010, which included the correct name of the [REDACTED] impurity. The registrant has claimed that the proposed product is substantially similar to the registered product with Reg. No. 264-1006 (formerly Reg. No. 34147-7). TRB has been asked to evaluate the product chemistry data submitted and determine the similarity of the proposed product to the registered product.

## SUMMARY OF FINDINGS:

1. The registrant has submitted a corrected basic formulation CSF (dated 09-15-09) for deltamethrin TGAI /MUP on March 5, 2010. The average purity of the active ingredient in TGAI/MUP is 98.5%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR§158.350(b)(2). The proposed certified limits for impurities  $\geq 0.1\%$  are based on those detected and quantified in preliminary analysis. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.320 and 158.350 respectively [MRID No. 478665-01].

2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.325. The registrant has submitted the MSDS's for all the starting materials used in the synthesis of the active ingredient amitraz technical [MRID No. 478665-01].

*deltamethrin*

\*Manufacturing process information may be entitled to confidential treatment\*



U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division (H7505C)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

EPA Reg. Number:  
73801-1

Date of Issuance:  
SEP 29 2010

Term of Issuance:  
Conditional

Name of Pesticide Product:  
Deltamethrin Technical

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration

(Under FIFRA as amended)

Name and Address of Registrant (include ZIP Code):  
Tagros Chemical India, Ltd.  
c/o Biologic, Inc. 115 Obtuse Hill Road  
Brookfield, CT 06804

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A), provided that:

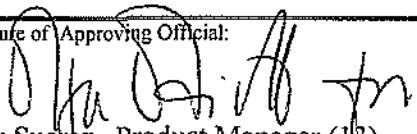
1. You will submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. You will make the following label changes before you release the product for shipment:
  - a) Revise the EPA Registration Number to read "EPA Reg. No. 73801-1."
  - b) Under Precautionary statements, revise the sentence "*Wash thoroughly with soap and water after handling*" to read: "*Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco*".
  - c) Under Conditions of sale and limitations of warranty, revise the sentence "*In no case shall Tagros...be liable for consequential...*" to read "*To the extent consistent with applicable law Tagros...shall not be liable...*"
3. This submission satisfies the data requirements corresponding to guidelines 830 Series Subgroups A & B, with the exception of storage stability (830.6317) and corrosion characteristics data (830.6320). A 1-year study, with observations made at 0, 3, 6, 9, and 12 months is required to satisfy these data requirements. Refer to the product chemistry review memorandum for details. Please submit these data no later than 16 months from the date of this letter (January, 2012).



4. The confidential statement of formula (CSF) dated 09-15-09 is acceptable.
5. Please submit three (3) copies of your revised labeling before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have questions regarding this action, please contact Olga Odiott at 703-308-9369.

Signature of Approving Official:



Mark Suarez, Product Manager (13)  
Insecticide Branch/Registration Division (7505P)

Date:

SEP 29 2010

Enclosures: Stamped label, Product Chemistry Review Memo, Tox Review Memo

# Deltamethrin Technical

## An Insecticide for Formulation Purposes Only

Active Ingredient:

Deltamethrin\*:.....98.5%

Inert Ingredients:.....1.5%

TOTAL.....100.0%

\*(1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

### WARNING

FIRST AID	
<b>If Swallowed:</b>	Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person.
<b>If Inhaled:</b>	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
<b>If on Skin or Clothing:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
<b>If in Eyes:</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours, without damage. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

SEP 29 2010  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

43801-1

## ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for the formulation into an insecticide for the following uses:

- 1) In and around non-food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation.
- 2) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable containers. Metal or Plastic: Do not reuse or refill this container. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Triple rinse as follows:

**Containers larger than 5 gallons:** Empty the remaining contents into formulation equipment or a mix tank. Fill the container  $\frac{1}{4}$  full with water. Replace and tighten closures. Tip container on its side and roll back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

**Pressure rinse as follows:** Empty the remaining contents into formulation equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

## CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Tagros Chemicals India, Ltd. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the

control of Tagros Chemicals India, Ltd.. In no case shall Tagros Chemicals India, Ltd. be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. TAGROS CHEMICALS INDIA, LTD. MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

EPA Reg. No. 73801-XX

EPA Est. No. 73801-IND-001

Net Weight:

Manufactured by:  
Tagros Chemicals India, Ltd.  
Jhaver Centre, Rajah Annamalai Building, 4<sup>th</sup> Floor  
59 Marshalls Road  
Egmore, Chennai  
600 008, India

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

**MEMORANDUM**

**Date:** Sept. 1, 2010

**SUBJECT:** Deltamethrin: Impurity Discussion for New Technical Grade Active Ingredient.  
EPA Reg. No. 73801-R.

PC Code: 097805  
Decision No.: 420682  
Petition No.: NA  
Risk Assessment Type: NA  
TXR No.: NA  
MRID No.: NA

DP Barcode: D375765  
Registration No.: 73801-R  
Regulatory Action: New Registration  
Case No.: NA  
CAS No.: 52918-63-5  
40 CFR: 180.435

**FROM:** Richard Loranger, Ph.D., Chemist  
Registration Action Branch 2  
Health Effects Division (7509C)

Handwritten signature of Richard Loranger in black ink.

**THRU:** Christina Swartz, Branch Chief  
Registration Action Branch 2  
Health Effects Division (7509C)  
and  
Christine Olinger, Senior Chemist  
Health Effects Division (7509C)

Handwritten signature of Christina Swartz in black ink.

Handwritten signature of Christine Olinger in black ink.

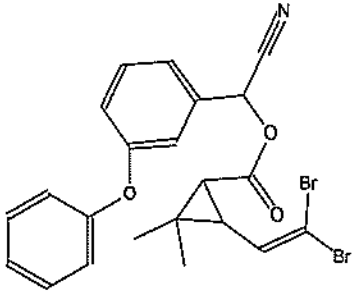
**TO:** Olga Odiott/Mark Suarez, RM 13  
Insecticide Branch  
Registration Division (7505C)

**I. Action Requested**

Tagros Chemicals India, Ltd. has requested registration of a technical grade (TGAI) product of the insecticide deltamethrin that has a different impurity profile from the currently registered TGAI. The Registration Division (RD) has requested HED comment on [REDACTED] impurity and its potential effects on the toxicity of the TGAI.

## Impurity Description

The Registration Division (Shyam Mathur, 3/15/2010, D371051) inquired about [REDACTED] impurity (see Table 1) in the proposed confidential statement of formula for EPA Reg. No. 73801-R, a new deltamethrin TGA1. In addition to an expert review of the toxicity databases of similar chemicals, HED used a qualitative toxicity prediction tool, DEREK (v. 11.0.0), to conduct a qualitative structure activity relationship (SAR) analysis for the parent and the impurity. The DEREK reports are available upon request and the DEREK alerts are summarized in Table 2 (see page 3).

Table 1. Active Ingredient and Impurity for EPA Reg. No. 73801-R.				
Chemical	Structure	NC (%)	UL (%)	LL (%)
<p>Deltamethrin</p> <p>(1R,3R)-S-cyano(3-phenoxyphenyl)methyl 3-(2,2-dibromoethenyl)-2,2-dimethylcyclopropanecarboxylate</p> <p>CAS No. 52918-63-5</p>		98.5	100	95.5

NC = nominal content; UL = upper limit; LL = lower limit

## Deltamethrin Hazard Characterization

References: D. Dotson, 2/17/10, D368592; E. Scollon, 8/13/2009, D367616

The toxicology database for deltamethrin is adequate for risk assessment. Acceptable studies include subchronic and chronic studies in rats, mice, and dogs; developmental studies in rats and rabbits; a reproduction study in rats; and acute, subchronic, and developmental neurotoxicity studies in rats. Sufficient studies are also available to assess dermal exposure, metabolism, and mutagenicity. As part of the new EPA Part 158 data requirements, an immunotoxicity study in rats and/or mice is required.

The target organ system for deltamethrin is the nervous system. In rats, mice, and dogs, effects included salivation, unsteadiness, convulsions, altered posture, hypersensitivity to sound, and

## HED Conclusions

A qualitative toxicity prediction tool (DEREK) was used to screen the identified impurity for potential hazards not included in the parent compound. As a positive control, the DEREK model was run for the parent deltamethrin. Table 2 summarizes the DEREK alerts reported for parent and the impurity.

Table 2. Summary of DEREK Alerts		
DEREK Alert	Parent	Impurity

--	--	--

The active ingredient and impurity generated the same alerts, which is not unexpected given the high degree of structural similarity. The impurity differs from the parent by only the presence of

As noted under the hazard characterization, the target organ system for deltamethrin is the nervous system as is the case for most pyrethroids. Therefore, the neurotoxicity alert is to be expected. Hepatotoxicity and teratogenicity are not noted in the hazard characterization for deltamethrin. The reference compounds in DEREK for these effects are

These compounds are much smaller than the deltamethrin molecule or the impurity.

In summary, HED concludes that the new deltamethrin TGA1 will not have a different toxicity profile than the registered product. Considering the levels of the impurity in question and its structural similarity to the active ingredient, HED has no additional concerns.

**ROUTING & TRANSMITTAL SLIP**

April 6, 2010

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

Mark Suarez, Product Manager

MCS

6 APRIL 2010

Marion Johnson, Chief, Insecticide Branch

[Signature]

8 APRIL 2010

Lois Rossi, Director, Registration Division

[Signature]

14 APRIL 2010

Marty Monell, Deputy Director, OPP

[Signature]

4-16-10

Linda Arrington, RD

Olga Odiott, RD IB

	Action	File	Note And Return
X	Approval	For Clearance	Per Conversation
	As Requested	For Correction	Prepare Reply
	Circulate	For Your Information	Review
	Comment	Investigate	See Me
	Coordination	Justify	X Signature

**Renegotiation of PRIA Due Date**

Decision # 40682

Reg. No. 73801-R

FROM: (Name, org. symbol, Agency/Post)

 Olga Odiott  
Insecticide Branch  
Registration Division/OPP  
7505P

Room No.-Bldg.

PY S-7247

Phone No.

703-308-9369

APR 14 2010

10920


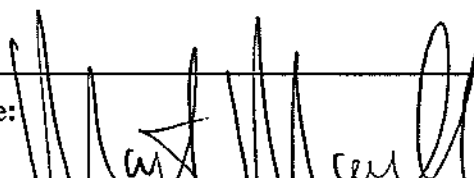
Registration Division

APR 12 2010

4246

DATE RECEIVED



Recommendation of Division Directors Negotiated Due Dates		
Decision#: 420682	Registration#: 73801-R	Petition #: N/A
Fee Category: R310		PRIA Decision Time Frame: 6 months
Submitted by: Olga Odiott		Branch: IB      Date: 04/06/2010
Company: Tagros Chemicals India Ltd.		
Original Due Date: 04/14/2010		Proposed New Due Date: 10/14/2010
Previous Negotiated Due Dates: N/A		
Is the "Fix" in-house? Yes		If not, date "Fix" expected:
<p>Issue (describe in detail):</p> <p>This is a me-too registration application for a technical grade deltamethrin product. The TRB product chemistry review identified an impurity in this new formulation that is not present in the cited registered product. TRB indicated that a substantial similarity determination for this me-too application is subject to an assessment of toxicity for the new impurity by the Health Effects Division.</p> <p>The application and TRB review memorandum have been forwarded to HED for their review.</p> <p>Summary of Deficiency Type:      Not Submitted (N)      Deficiencies (D)  Product Chemistry: ____ Acute Tox: ____ Efficacy: ____ Labeling: ____ Other: ____</p>		
<p>Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates):</p> <p>The company was informed of the situation and agreed to the renegotiation. See attached e-mail from L.Miller, Agent to Tagros Ltd.</p>		
<p>Rationale for Proposed Due Date:</p> <p>Provide review time for HED.</p>		
Registrant notified that this is the last negotiation?    Yes <input checked="" type="checkbox"/> Not Applicable		
Approve: 		Disapprove:
If disapproved, action to be taken:		
OD or DOD Signature: 		Date: 4-16-10

RE: 73801-R  
Lawrence A. Miller  
to:  
Olga Odiott  
04/06/2010 04:09 PM  
Cc:  
Mark Suarez, Shyam Mathur, "meenu", "drshahabuddin", rao, rmathew  
Show Details

Dear Ms. Odiott:

This is in further reference to our telephone conversation this afternoon regarding the above subject. As we discussed, I have had several communications with the applicant (Tagros Chemicals India, Ltd.) over the past few days and, based on Dr. Mathur's review, they understand that the only issue is the [REDACTED] impurity, which must now be considered by the EPA Health Effects Division (HED). Although the applicant is disappointed by the delay in processing their application, my client has instructed me to convey the following on their behalf:

- ✓ Tagros agrees to extend the PRIA Decision Date until October 14, 2010 to allow the Agency more time to consider the [REDACTED] impurity.
- ✓ Although Tagros does not understand why it will take six months to resolve this issue, they realize that there may be other circumstances unknown to them at this time. Nevertheless, we are kindly requesting that the Agency please try to expedite processing this application as quickly as possible.
- ✓ With regard to the toxicity of [REDACTED], we have searched for any published literature that might be helpful, but so far we have not been successful. However, Tagros has provided some information about this compound concerning its structural similarity to deltamethrin and cypermethrin (see attached Word file); we would also like to point out that the [REDACTED] impurity is present in Tagros' deltamethrin technical at [REDACTED] weight.
- ✓ Finally, please note that this application is proposed for non-crop and non-food uses only and, therefore, dietary exposure should not be an issue.

If you have any questions or need additional information, please let me know.

Best Regards,

Lawrence A. Miller  
BIOLOGIC, Inc.  
115 Obtuse Hill Road  
Brookfield, CT 06804

Tel: (203) 740-1200  
Fax: (203) 740-1220  
Email: [lmiller@biologicconsulting.com](mailto:lmiller@biologicconsulting.com)

**BIOLOGIC INC.**  
*agribusiness professionals*

CONFIDENTIALITY STATEMENT: This electronic message contains information that may be confidential or privileged. The information is intended solely for the use of the individual(s) or entity (ies) named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this email in error, please notify us immediately by telephone at 203-740-1200 or by email reply and delete this message. Thank you.

-----Original Message-----

From: Odiott.Olga@epamail.epa.gov [mailto:Odiott.Olga@epamail.epa.gov]  
Sent: Wednesday, March 31, 2010 4:58 PM  
To: lmiller@biologicconsulting.com  
Cc: Suarez.Mark@epamail.epa.gov  
Subject: 73801-R

Mr. Miller,

Per our phone conversation minutes ago, here is a copy of the product chemistry review for the subject product. We are asking to renegotiate this PRIA action for October 14, 2010-- 6 months from the original PRIA due date. There is an impurity in this new formulation that is not present in the cited registered product. The substantial similarity determination for this me-too application is subject to an assessment of toxicity for the new impurity by the Health Effects Division (HED).

Please acknowledge receipt of this e-mail.

If you have any question, please let me know.

Regards,

Olga Odiott

file: 73801-R Chem.PDF)

(See attached

---

Olga Odiott, Senior Biologist

Insecticides Branch / Registration Division Office of Pesticide Programs U.S.

Environmental Protection Agency

(703) 308-9369

(703) 305-6596 (fax)

odiott.olga@epa.gov

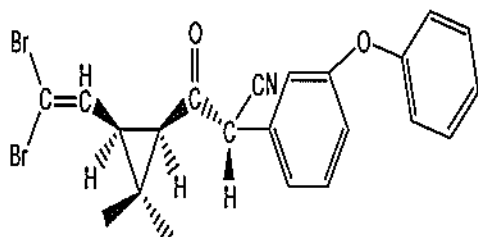
The structure of [REDACTED] very close to Deltamethrin and cypermethrin.

In deltamethrin there are 2 bromine atoms attached to the vinyl carbon, but in [REDACTED]

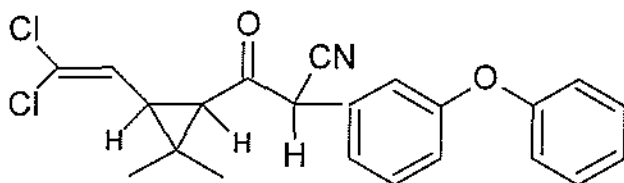
In cypermethrin there are two chlorine atoms are attached to the vinyl carbon atom, but in [REDACTED]

Therefore it may be concluded that the toxicity of [REDACTED] will be in the range of cypermethrin or deltamethrin.

#### Structure of Deltamethrin



#### Structure of Cypermethrin



Finally, please communicate to the EPA that the registration application for Tagros' deltamethrin technical is intended for non-crop and non-food uses only. Consequently, there should be no issues concerning dietary exposure to the general public.



73801-R  
Olga Odiott to: Imiller  
Cc: Mark Suarez

03/31/2010 04:57 PM

Mr. Miller,

Per our phone conversation minutes ago, here is a copy of the product chemistry review for the subject product. We are asking to renegotiate this PRIA action for October 14, 2010-- 6 months from the original PRIA due date. There is an impurity in this new formulation that is not present in the cited registered product. The substantial similarity determination for this me-too application is subject to an assessment of toxicity for the new impurity by the Health Effects Division (HED).

Please acknowledge receipt of this e-mail.

If you have any question, please let me know.

Regards,

Olga Odiott



73801-R Chem.PDF

Olga Odiott, Senior Biologist  
Insecticides Branch / Registration Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 308-9369  
(703) 305-6596 (fax)  
odlott.olga@epa.gov

4/6/10

⇒ Larry & will renegotiate

⇒ any other information about toxicity of this product ⇒ (conv: w/ John Redder)

⇒ Note from Tagro

⇒ brief bright up on chemistry - structurally close to edg have this

⇒ since no af. uses being proposed - not as protect

⇒ acute tox data ??

FEE

DP BARCODE: D371051; FILE SYMBOL No.: 73801-R; PRODUCT: Deltamethrin Technical

Date: March 15, 2010

SUBJECT: Product Chemistry Review of Deltamethrin Technical TGAI / MUP

FROM: Shyam B. Mathur, PhD  
Product Chemistry Team Leader  
Technical Review Branch/RD (7505P)

*S. B. Mathur*  
3/15/10

TO: Olga Odiott / Richard Gebken, RM 13  
Insecticide Branch / RD (7505P)

*m*

DP BARCODE: D371051  
DECISION No.: 420682  
File Symbol No.: 73801-R  
PRODUCT: Deltamethrin technical TGAI / MUP  
PCC: 097805  
REGISTRANT: Tagros Chemicals India Limited  
USE: Insecticide  
FOOD USE: No

#### INTRODUCTION:

The registrant Tagros Chemicals India Limited has submitted a "me-too" registration application for 98.50% Deltamethrin TGAI/MUP. The deltamethrin technical TGAI / MUP is produced by Tagros Chemicals India Ltd., at Madras in India. In support of the application, the registrant has submitted 830 series group A and group B data with MRID Nos. 478665-01 through 478665-03, CSF for basic formulation (dated 09-15-09) and the product label. A corrected basic CSF (dated 09-15-09) was submitted on March 5, 2010, which included the correct name of the [REDACTED] impurity. The registrant has claimed that the proposed product is substantially similar to the registered product with Reg. No. 264-1006 (formerly Reg. No. 34147-7). TRB has been asked to evaluate the product chemistry data submitted and determine the similarity of the proposed product to the registered product.

#### SUMMARY OF FINDINGS:

1. The registrant has submitted a corrected basic formulation CSF (dated 09-15-09) for deltamethrin TGAI /MUP on March 5, 2010. The average purity of the active ingredient in TGAI/MUP is 98.5%, as determined by the five batch analysis. The proposed certified limits for the AI are based on the standard certified limits as set forth in 40CFR§158.350(b)(2). The proposed certified limits for impurities  $\geq 0.1\%$  are based on those detected and quantified in preliminary analysis. The product chemistry data submitted corresponding to guideline reference 830.1550 (product identity & composition) and 830.1750 (certified limits) satisfy the data requirements of 40CFR§158.320 and 158.350 respectively [MRID No. 478665-01].
2. The product chemistry data submitted corresponding to guideline reference 830.1600 (description of material used to produce the product) satisfy the data requirements of 40CFR§ 158.325. The registrant has submitted the MSDS's for all the starting materials used in the synthesis of the active ingredient amitraz technical [MRID No. 478665-01].

\*Manufacturing process information may be entitled to confidential treatment\*

DP BARCODE: D371051; FILE SYMBOL No.: 73801-R; PRODUCT: Deltamethrin Technical

3. The product chemistry data submitted corresponding to guideline reference 830.1620 (description of production process) satisfy the data requirements for 40CFR§158.330. The synthesis of deltamethrin technical is a batch process carried out in [REDACTED]

[REDACTED] The applicant has provided the details of the chemical process with reaction conditions, equipment used, working up procedures, and quality assurance steps [MRID No. 478665-01].

4. The product chemistry data submitted corresponding to guideline reference 830.1670 (discussion on the formation of impurities) satisfy the data requirements for 40CFR§158.340. During the production of deltamethrin tgai/mup, the registrant reported the potential formation of [REDACTED] impurities, out of which only [REDACTED] impurities were found to be present at the concentrations of  $\geq 0.1\%$ , rest of the [REDACTED] impurities were found to be present at the concentration of  $\leq 0.1\%$  in addition to the moisture. These impurities were quantified during the preliminary analysis [MRID No. 478665-01].

5. The data submitted corresponding the guideline reference 830.1700 (preliminary analysis) satisfy the data requirements of 40CFR§158.345. The study was conducted under GLP requirements in compliance with 40CFR§160. The analysis study was performed by Charles River Laboratories, Tranent, Edinburgh, England. Five representative batches of the deltamethrin tgai/mup were analyzed for percent active ingredient and the impurities. The active ingredient and the [REDACTED] impurities were identified and quantified by using HPLC-UV with internal standard quantification methods. The analytical methods used for the assay for the active ingredient and impurities have been described in details. The analytical methods were validated for accuracy, linearity, LOD & LOQ, precision and solution stability [MRID Nos. 478665-02].

6. The data submitted corresponding the guideline reference 830.1800 (enforcement analytical method) satisfy the data requirements of 40CFR§158.355. The purity of the AI in the TGAi was determined by HPLC-UV by internal standard method. The method utilized a Thermo Hypersil Silica column (4.6 x 250 mm, 5  $\mu$ m). The analytical methods were validated for accuracy, linearity, LOD & LOQ, precision and solution stability [MRID Nos. 478665-02].

7. The data submitted or cited corresponding to 830 series group B (physical-chemical properties) satisfy the data requirements of 40CFR§158.310 (e), except for one year studies corresponding to guidelines storage stability (830.6317) and corrosion characteristics (830.6320) [MRID No. 478665-03].

DP BARCODE: D371051; FILE SYMBOL No.: 7380 t-R; PRODUCT: Deltamethrin Technical

**CONCLUSIONS:**

The TRB has reviewed the product chemistry data submitted for Deltamethrin TGAi/MUP (produced by Tagros Chemicals India, Madras, India) and has concluded that:

t. All the product chemistry data submitted corresponding to the guidelines 830 Series group A and group B are acceptable, except for storage stability (830.6317) and corrosion characteristics (830.6320).

2. The proposed corrected CSF for basic formulation (dated 09-15-09) is acceptable and is supported by five batch analytical data.

3. The registrant must conduct the one year storage stability (830.6317) and corrosion characteristics (830.6320) studies for the proposed deltamethrin tga/mup under full GLP requirements. It is recommended that the observations should be made at the intervals of 0 (initial), 3 month, 6 month, 9 month, and 12 month (final). The results must be submitted to the Agency on completion.

4. The substantial similarity determination of the proposed product (File symbol No. 73801-R) with the registered product with Reg. No. 264-1006 is subject to the toxic characteristics assessment by HED of the new impurity present in the proposed deltamethrin tga/mup. This new impurity is not present in the cited deltamethrin product. For the structures of these impurities, please see Page # 20. There is significant difference in density values of the two products (1.5868 g/ml in proposed vs 0.55 g/ml in cited product)

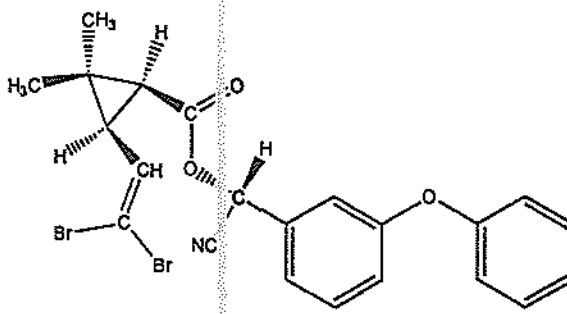
**To PM:** It is recommended that the HED should determine the toxic characteristics of the above mentioned impurity.



DP BARCODE: D371051; FILE SYMBOL No.: 73801-R; PRODUCT: Deltamethrin Technical

830.1550. Product identity & Composition: (MRID No. 478665-01)

Name:	Deltamethrin TG AI
Active Ingredient Name (IUPAC):	( <i>S</i> )- $\alpha$ -cyano-3-phenoxybenzyl (1 <i>R</i> , 3 <i>R</i> )-3-(2, 2-dibromovinyl)-2, 2-dimethylcyclopropane carboxylate
CAS Number:	52918-63-5
Molecular Weight:	505.2 g/mol
Molecular Formula:	C <sub>22</sub> H <sub>19</sub> Br <sub>2</sub> NO <sub>3</sub>
Structure:	



DP BARCODE: D371051; FILE SYMBOL No.: 73801-R; PRODUCT: Deltamethrin Technical

Table 1. Manufacturing and Impurity Data for deltamethrin TGAI / MUP				
GLN	Requirement	MRID	Status	Details and/or Deficiency
830.1550	Product Identity and composition	Basic CSF (09-15-09)	A	The NC of AI (98.5%) is supported by 5 batch analysis & agrees with the label claim nominal concentration. The registrant discussed the formation of f [REDACTED] impurities. Only [REDACTED] impurities were found at the concentrations of greater than 0.1%.
8301600	Description of materials used to produce the product	478665-01	A	The description & composition for all the starting materials used to produce deltamethrin technical (produced at Madras in India) have been provided by the registrant
830.1620	Description of production process	478665-01	A	[REDACTED] [REDACTED] The production process has been described in full details.
830.1670	Discussion of formation of impurities	478665-01	A	During the production of deltamethrin tgai/mup, the registrant reported the potential formation of [REDACTED] impurities, out of which only [REDACTED] impurities were found to be present at the concentrations of $\geq 0.1\%$ , rest of the [REDACTED] impurities were found to be present at the concentration of $\leq 0.1\%$ in addition to the moisture. The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present in the product.
830.1700	Preliminary analysis	478665-02	A	Five representative batches deltamethrin technical (produced by Tagros in India) were analyzed for percent active ingredient and the impurities. The active ingredient and the [REDACTED] impurities were identified and quantified by using HPLC-UV with internal standard quantification methods. The analytical methods used for the assay for the active ingredient and impurities have been described in details.
830.1750	Certified limits	478665-01	A	The proposed certified limits for the AI are based on standard certified limit table set-forth in 40CFR§158.350(b)(2). The certified limits for the organic impurities were based on the five batch analysis.
830.1800	Enforcement analytical method	478665-02	A	The HPLC-UV (254 nm) with internal standard method was used for the determination of the AI content in the TGAi/MUP. The method was validated for precision, linearity and accuracy.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required)				

DP BARCODE: D371051; FILE SYMBOL No.: 73801-R; PRODUCT: Deltamethrin Technical

### 830 Series group B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties of : Deltamethrin technical II TGA1 / MUP (Tagros, India)				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	478665-03	A	Off white
830.6303	Physical state	" " "	A	Solid (powder)
830.6304	Odor	" " "	A	Not performed
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	" " "	A	Test substance was found to be stable with Fe powder, Fe acetate, Al powder and Al acetate during storage at room and at 54°C for 14, 7, 2 and 1 days. The test substance was found to be stable at 54°C and at room temperature for two weeks.
830.6314	Oxidation/reduction; chemical incompatibility		NA	Does not contain any oxidizing or reducing agent
830.6315	Flammability		NA	
830.6316	Explosibility		NA	
830.6317	Storage stability		G	No data provided or cited
830.6319	Miscibility		NA	
830.6320	Corrosion characteristics		G	No data provided or cited
830.7000	pH	478665-03	A	4.59 at 20.0°C
830.7050	UV/Visible absorption	" " "	A	See Note 1
830.7100	Viscosity		NA	
830.7200	Melting point	478665-03	A	100-101°C
830.7220	Boiling point		NA	
830.7300	Relative Density	478665-03	A	1.5868 @ 25°C
830.7370	Dissociation constants in water (DC)		NA	See Data Matrix (09-10-09) Foot Notes
830.7550	Partition coefficient	478665-03	A	Log Po/w = 5.96
830.7840	Water solubility	478665-03	A	<3.2 mg/ml; See Note 2
830.7950	Vapor pressure	478665-03	A	< 5.910 <sup>-4</sup> Pa at 25°C

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Upgrade (additional information required); TBA = To Be Assigned

DP BARCODE: D371051; FILE SYMBOL No.: 73801-R; PRODUCT: Deltamethrin Technical

Note 1: 830.7050 (UV-VIS): (MRID No. 478665-03)

$\lambda$  max pH <2 = 204 + 278 nm

Log10  $\epsilon$  pH <2 = 2.75 at 290 nm

$\lambda$  max MeOH = 205 + 268 nm

Log10  $\epsilon$  MeOH = 2.92 at 290 nm

$\lambda$  max pH >10 = 224 + 305 nm

Log10  $\epsilon$  pH > 10 = 3.61 & 3.65 at 290 nm + 305 nm

Note 2: 830.7840 (Water Solubility) at 20°C: (MRID No. 478665-03)

Milli-RO Water < 3.21 ng/ml

pH 4 Buffer < 3.24 ng/ml

pH 7 Buffer < 6.69 ng/ml

pH 9 Buffer < 4.57 ng/ml

830.1800. Enforcement of analytical method: (MRID No. 478665-02)

Deltamethrin TGA1 samples are assayed for the active ingredient content by HPLC with UV detection, following dissolution in benzyl benzoate internal standard solution.

Apparatus & parameters

Instrument: Waters Alliance 2695 with Waters 2487 Tineable absorbance detector

HPLC column: Thermo Hypersil Silica, 250 mm x 4.6 mm, 5  $\mu$ m particle size

Flow rate: 1.0 ml/min

Injection volume: 20  $\mu$ l

UV detector wavelength: 254 nm

Temperature: Ambient

Run time: 15 minutes

Retention time: S-Deltamethrin = ca 8.0 – 9.0 min.

Mobile phase: 95:5 (v/v) iso-octane/1, 4-dioxane

\*Pages 85-98 Manufacturing process information may be entitled to confidential treatment\*

# Decision Information for 73801-R

Decision Seq: 420682 Action Code: R310, NEW PRODUCT; NON-FAST TRACK (INCLUDES REVIEWS) ...

FFS Start Date: 14-Oct-2009 Tentative Ind: No FFS Original Decision: ...

Due Date: 14-Apr-2010 75-Day Due Date: ... FFS EUP Decision: ...

OPP Target Due Dt: ... FFS Primary Decision: ...

Negotiated Due Dt: ... Start/Stop Clock: FGPA Clock: ...

Registrant: Response Due Date: ... Days Elapsed: ...

Current Status: PENDING (24-Sep-2009)

Decision Status

Tracking

Create Resubmission

FFS Letters

FFS Documentation

Action Code History

Decision Comments

Payment

Unmatched Payments

75 Day Letters

Meetings & Milestones

FFS Information

FFS Negotiated Due Dates

OPP Target Due Date

Decision Ownership

Receipts

Data Package

Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S: 858794	Odiott, Olga	73801-R	14-Apr-2010	PENDING

New technical product; source in India

Viewing Record 1 of 1

## Memorandum

Date: 9 / 30 / 09

To: PM 13, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

September 29, 2009

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

TAGROS CHEMICALS INDIA LTD.  
C/O BURLINGTON SCIENTIFIC CORP.  
71 CAROLYN BLVD.  
FARMINGDALE, NY 11735

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 23-SEP-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



# Receipt for Section 3

S: 858794

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☒ Yes ☐ No

Application Type: New Registration

Billable: ☒ Yes ☐ No

Company: 73801 TAGROS CHEMICALS INDIA LTD.

V

Risk Manager: Registration Division, Risk Management Team 13

Product #: 73801-R Product Name: DELTAMETHRIN TECHNICAL

Override#:

Me Too  
Section3: 284-1006

Me Too  
Product Name: DELTAMETHRIN TECHNICAL

Application Date: 15-Sep-2009



OPP Rec'd Date: 23-Sep-2009



Front End Date: 23-Sep-2009



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Application for registration for a new pesticide product

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

CSF

View/Edit

# BIOLOGIC INC.

*agribusiness professionals*

September 15, 2009

Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Room S-4900, 4<sup>th</sup> Floor  
Arlington, VA 22202

Attention: Mr. Richard Gebken (PM #10)  
RE: Deltamethrin Technical; EPA Reg. No. 73801-X  
Application for Pesticide Registration

Dear Mr. Gebken:

On behalf of Tagros Chemicals India Ltd. we are submitting this Application for Pesticide Registration for "Deltamethrin Technical" for formulation purposes into an insecticide for uses in and around non-food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation. The following documents are provided in order to process this application:

**Volume 1**      **Administrative Materials**

- Application for Pesticide Registration (EPA Form 8570-1)
- Certification With Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35)
- Confidential Statement of Formula (EPA Form 8570-4)
- Five (5) copies of draft labeling

**Volume 2**      **Product Identity and Composition of Deltamethrin TGAI:**

47866501      Selected Studies to Fulfill OPPTS Guideline Series 830 in Accordance with 40 CFR Parts 158.155, 158.160, 158.162 and 158.167; Description of Materials Used to Produce the Product; Description of the Production Process; Discussion of the Formation of Impurities; and Certified Limits.

OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670, and 830.1750

**Volume 3**      **Preliminary Analysis and Enforcement Analytical Method for Deltamethrin TGAI:**

47866502      Selected Studies to Fulfill Requirements of OPPTS Guidelines 830.1700 and 830.1800.

OPPTS Guidelines 830.1700 and 830.1800

**Volume 4**      **Product Chemistry of Deltamethrin TGAI:**

47866503      Selected Studies to Fulfill OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7200, 830.7300, 830.7570, 830.7840/60 and 830.7950.

OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7200, 830.7300, 830.7570, 830.7840/60 and 830.7950.

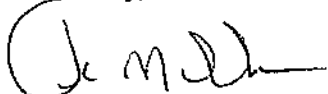
---

This application for a new pesticide product will fall within the category on Table 4 - Registration Division: New Products, EPA No. R310; CR No. 46. This product is identical in labeling and similar in formulation to EPA Reg. No. 34147-7 "Deltamethrin Technical". The PRIA fee for the application is \$4,578.

To satisfy any remaining data requirements for this registration, Tagros Chemicals India Ltd. has chosen the cite-all option and has sent offer to pay letters to all companies listed on the March 2009 EPA Data Submitters List for Deltamethrin.

Should you have any questions, or wish to reach me, please feel free to contact our office at 203-740-1200.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. Miller', with a stylized flourish at the end.

Jane Miller  
Agent to Tagros Chemicals India Ltd.

21-Day Screen Completed by  
Contractor

21-Day Expires on 10-14-09

Jacket # 73801-R  
MRID# 478665

Content Screen: Recommended to  
Pass/Fail

86-5 Review: Passed/Failed/NA

Transfer This Jacket to:

LINDA ARRINGTON

# PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 9/23/09

Experts In-Processing Signature: [Signature]

Date 9/25

Fee Paid: Yes ☒ No ☐

Division management contacted on issues No ☐ Yes ☐ Date \_\_\_\_\_

EPA Reg. Number: <u>73801-R</u>		EPA Receipt Date: <u>9/23/09</u>				
Items for Review				Yes	No	N/A*
1	<b>Application Form</b> (EPA Form 8570-1)(link to form) signed & complete including package type			<input checked="" type="checkbox"/>		
2	<b>Confidential Statement of Formula</b> all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			<input checked="" type="checkbox"/>		
	a) All inerts (link to <a href="http://www.epa.gov/opprd001/inerts/">http://www.epa.gov/opprd001/inerts/</a> ), including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		<input checked="" type="checkbox"/>	<input type="checkbox"/>			
3	<b>Certification with Respect to Citation of Data</b> (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
	Certificate and data matrix consistent			<input checked="" type="checkbox"/>		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	<b>Formulator's Exemption Statement</b> (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					<input checked="" type="checkbox"/>
5	<b>Data Matrix</b> (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
	a) Selective Method (Fee category experts use)	yes	no			
		<input checked="" type="checkbox"/>	<input type="checkbox"/>			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	<b>5 Copies of Label</b> (link to <a href="http://www.epa.gov/oppfead1/labeling/lrm/">http://www.epa.gov/oppfead1/labeling/lrm/</a> ) (Electronic labels on CD are encouraged and guidance is available)( link to <a href="http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels">http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels</a> )			<input checked="" type="checkbox"/>		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X		
8	Notice of Filing (link to <a href="http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm">http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm</a> ) included with petitions (link to <a href="http://www.epa.gov/pesticides/regulating/tolerances.htm">http://www.epa.gov/pesticides/regulating/tolerances.htm</a> )			X
9	If applicable for conventional applications, reduced risk rationale (link to <a href="http://www.epa.gov/opprd001/workplan/reducedrisk.html">http://www.epa.gov/opprd001/workplan/reducedrisk.html</a> )			X
10	Required Data (link to <a href="http://www.epa.gov/pesticides/regulating/data_requirements.htm">http://www.epa.gov/pesticides/regulating/data_requirements.htm</a> ) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

Passed 86-5 Review - MRID 478665  
CSF contains active ingredient and impurities

-JD

478665

\* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses even if a product is currently registered by consulting the inert Web

site [link to <http://www.epa.gov/opprd001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at [inertsbranch@epa.gov](mailto:inertsbranch@epa.gov) and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to [http://www.epa.gov/oppbppd1/biopesticides/contacts\\_bppd.htm](http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm)].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/opprd001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;



3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

**Script for Rejection Phone calls**

**Contact Name:** Jane Miller  
**Phone #:** 203-740-1260  
**Email:** j.miller@biologicconsulting.com

**First Call/Initials:**

**Date:** 7/29  
**Time:** 12:45

**Second Call/Initials:**

**Date:**  
**Time:**

**This is \_\_\_\_\_, EPA contractor.**

**I'm calling regarding your submission in support of**

Application to Register Deltamethrin Technical

**We have found the following deficiencies regarding:**

**PR Notice 86.5: Yes or No**

**Volume/Study Title:** Product Identity and Composition of Deltamethrin TGA I  
vol 2 - judging from the pagination, pg. 24 is missing

**Volume/Study Title:**

**Volume/Study Title:**

**Additional volumes continued on back of page: Yes or No**

**Application Package: Yes or No**

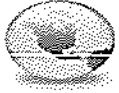
Certification - chose selective method

**These deficiencies have been approved by EPA.**

**The corrections can be faxed to 703-305-5060/Attn: \_\_\_\_\_.**

**Second Call/Email:**

**If we do not receive the corrections by \_\_\_\_\_, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.**



RE: Application to Register Deltamethrin Technical  
Jane Miller to: Jennifer Drobish

09/29/2009 02:17 PM

Dear Ms. Drobish:

I have attached the corrected Certification With Respect to Citation of Data form and Page 24. There was an error in pagination and page 24 was skipped, it did not contain any information. We have noted that it is "left blank".

Best Regards,

Jane M. Miller  
BIOLOGIC, Inc.  
115 Obtuse Hill Road  
Brookfield, CT 06804

Tel: 203-740-1200  
Fax: 203-740-1220

-----Original Message-----

From: Drobish.Jennifer@epamail.epa.gov  
[mailto:Drobish.Jennifer@epamail.epa.gov]  
Sent: Tuesday, September 29, 2009 12:43 PM  
To: jmill@biologicconsulting.com  
Subject: Application to Register Deltamethrin Technical

Ms Miller

This is Jennifer Drobish, EPA Contractor. I'm writing in regards to your submission in support of the application to register Deltamethrin Technical. We have found deficiencies regarding PR Notice 86.5 and the Application Package.

PR Notice 86.5:

-Volume 2 "Product Identity and Composition of Deltamethrin TGAI":  
Judging from the pagination, page 24 is missing

Application Package:

-The Certification with Respect to Citation of Data is inconsistent with the Data Matrix. This can be corrected by submitting another Certification and marking the "Selective Method." There is a "Cite-All" option under the selective method.

The corrections can either be faxed to me at 703-305-5060/Attn: Jennifer Drobish or emailed to me at drobish.jennifer@epa.gov

Thank you  
Jennifer Drobish  
EPA Contractor  
703-305-1671



Tagros Deltamethrin Corrected Pages.pdf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

September 24, 2009

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

OPP Decision Number: D-420682  
EPA File Symbol or Registration Number: 73801-R  
Product Name: DELTAMETHRIN TECHNICAL  
EPA Receipt Date: 23-Sep-2009  
EPA Company Number: 73801  
Company Name: TAGROS CHEMICALS INDIA LTD.

M. ROITBERG  
TAGROS CHEMICALS INDIA LTD.  
C/O BURLINGTON SCIENTIFIC CORP.  
71 CAROLYN BLVD.  
FARMINGDALE, NY 11735

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT  
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee  
Ombudsman at (703) 305-6249.

Sincerely,

A handwritten signature in cursive script, appearing to read "Teresa Owens".

Front End Processing Staff  
Information Technology & Resources Management Division

# Fee for Service

{858794\_~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 10

Receipt No.

S- 858794

EPA File Symbol/Reg. No.

73801-R

Pin-Punch Date:

9/23/2009

☐ This item is NOT subject to FFS action.

## Action Code:

Requested: 310

Granted: 310

Amount Due: \$ 4,578

## Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: 

Date: 9/24/09

Remarks:

# Receipt for Section 3

S: 858794

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☒ Yes ☐ No

Application Type: New Registration

Billable: ☒ Yes ☐ No


Company: 73801 TAGROS CHEMICALS INDIA LTD. V


Risk Manager: Registration Division, Risk Management Team 13


Product #: 73801-R Product Name: DELTAMETHRIN TECHNICAL


Override#:

Me Too Section3: 264-1006 Me Too Product Name: DELTAMETHRIN TECHNICAL

Application Date: 15-Sep-2009 

OPP Rec'd Date: 23-Sep-2009 

Front End Date: 23-Sep-2009 

Risk Manager Send Date: 

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Application for registration for a new pesticide product

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

CSF

View/Edit

# FEE FOR SERVICE



## Online Payment

## Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

## Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 24VPE67C

Agency Tracking ID: 74081310957

Transaction Date and Time: 09/22/2009 15:38 EDT

## Payment Summary

Address Information	Account Information	Payment Information
Account Holder Name: Jane Miller	Card Type: Visa	Payment Amount: \$4,578.00
115 Obtuse Hill	Card Number: *****0690	Transaction Date 09/22/2009
Billing Address: Road	Decision Number:	and Time: 15:38 EDT
Billing Address 2:	Registration Number:	
City: Brookfield		
State / Province: CT		
Zip / Postal Code: 06804		
Country: USA		

9/22/2009 15:38 EDT

**From:** paygovadmin@mail.doc.twai.gov  
**ent:** Tuesday, September 22, 2009 3:38 PM  
**To:** jmiller@biologicconsulting.com  
**Subject:** Pay.Gov Payment Confirmation

Your transaction has been successfully completed.

Application Name: PRIA Service Fees  
Pay.gov Tracking ID: 24VPE67C  
Agency Tracking ID: 74081310957

Account Holder Name: Jane Miller  
Transaction Type: Sale  
Billing Address: 115 Obtuse Hill Road  
City: Brookfield  
State/Province: CT  
Zip/Postal Code: 06804  
Country: USA  
Card Type: Visa  
Card Number: \*\*\*\*\*0690  
Payment Amount: \$4,578.00  
Transaction Date: Sep 22, 2009 3:38:15 PM  
Decision Number:  
Registration Number:

September 15, 2009

Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Room S-4900, 4<sup>th</sup> Floor  
Arlington, VA 22202

Attention: Mr. Richard Gebken (PM #10)  
RE: Deltamethrin Technical; EPA Reg. No. 73801-X  
Application for Pesticide Registration

Dear Mr. Gebken:

On behalf of Tagros Chemicals India Ltd. we are submitting this Application for Pesticide Registration for "Deltamethrin Technical" for formulation purposes into an insecticide for uses in and around non-food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation. The following documents are provided in order to process this application:

**Volume 1 Administrative Materials**

- Application for Pesticide Registration (EPA Form 8570-1)
- Certification With Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35)
- Confidential Statement of Formula (EPA Form 8570-4)
- Five (5) copies of draft labeling

**Volume 2 Product Identity and Composition of Deltamethrin TGA1:**

Selected Studies to Fulfill OPPTS Guideline Series 830 in Accordance with 40 CFR Parts 158.155, 158.160, 158.162 and 158.167; Description of Materials Used to Produce the Product; Description of the Production Process; Discussion of the Formation of Impurities; and Certified Limits.

OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670, and 830.1750

**Volume 3 Preliminary Analysis and Enforcement Analytical Method for Deltamethrin TGA1:**

Selected Studies to Fulfill Requirements of OPPTS Guidelines 830.1700 and 830.1800.

OPPTS Guidelines 830.1700 and 830.1800

**Volume 4 Product Chemistry of Deltamethrin TGA1:**

Selected Studies to Fulfill OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7200, 830.7300, 830.7570, 830.7840/60 and 830.7950.

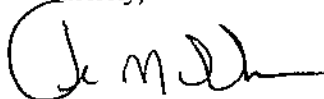
OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6313, 830.7000, 830.7050, 830.7200, 830.7300, 830.7570, 830.7840/60 and 830.7950.

This application for a new pesticide product will fall within the category on Table 4 - Registration Division: New Products, EPA No. R310; CR No. 46. This product is identical in labeling and similar in formulation to EPA Reg. No. 34147-7 "Deltamethrin Technical". The PRIA fee for the application is \$4,578.

To satisfy any remaining data requirements for this registration, Tagros Chemicals India Ltd. has chosen the cite-all option and has sent offer to pay letters to all companies listed on the March 2009 EPA Data Submitters List for Deltamethrin.

Should you have any questions, or wish to reach me, please feel free to contact our office at 203-740-1200.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Miller', written over a circular mark.

Jane Miller

Agent to Tagros Chemicals India Ltd.



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 73801-XX R	2. EPA Product Manager R. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Deltamethrin Technical	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>34147-7 264-1006</u> Product Name <u>Deltamethrin Technical</u>	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application for a new pesticide product will fall within the category on Table 4 - Registration Division: New Products as published in the August 2008 Federal Register. This product is further defined under EPA No. 310; CR No. 46. Tagros Chemicals is submitting product chemistry and using the cife-all option for any data that may be applicable to this registration action. The PRIA fee for this application is \$4,578.

Jane Miller Tel: (203) 740-1200; Fax: (203) 740-1220; Email: jmill@biologicconsulting.com

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg.		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jane M. Miller	Title Agent	Telephone No. (Include Area Code) 203-740-1200
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
Signature 	3. Title Agent	
4. Typed Name Jane M. Miller	5. Date September 15, 2009	



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804	EPA Registration Number/File Symbol 73801-XX
Active Ingredient(s) and/or representative test compound(s) Deltamethrin	Date September 15, 2009
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Non-Food, Domestic Outdoor	Product Name Deltamethrin Technical

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

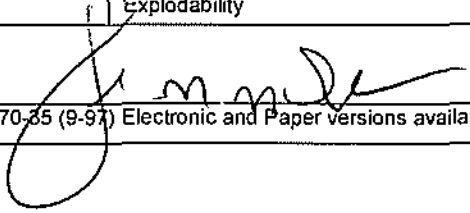
I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Sept 15, 2009	Typed or Printed Name and Title Jane M. Miller, Agent
---------------	-----------------------	--

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

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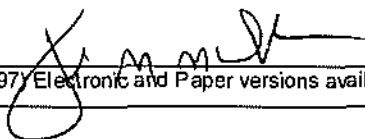
**DATA MATRIX**

Date September 10, 2009			EPA Reg. No./File Symbol 73801-XXX		Page 1 of 9
Applicant's/Registrant's Name & Address			Product:		
Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition		TAGROS CHEMICALS INDIA, LTD.	Own	
830.1600	Description of Materials Used to Produce the Product		TAGROS CHEMICALS INDIA, LTD.	Own	
830.1620	Description of Production Process		TAGROS CHEMICALS INDIA, LTD.	Own	
830-1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities		TAGROS CHEMICALS INDIA, LTD.	Own	
830.1700	Preliminary Analysis		TAGROS CHEMICALS INDIA, LTD.	Own	
830.1750	Certified Limits		TAGROS CHEMICALS INDIA, LTD.	Own	
830.1800	Enforcement Analytical Method		TAGROS CHEMICALS INDIA, LTD.	Own	
830.1900	Submittal of Samples				2
830.6302	Color		TAGROS CHEMICALS INDIA, LTD.	Own	
830.6303	Physical State		TAGROS CHEMICALS INDIA, LTD.	Own	
830.6304	Odor		TAGROS CHEMICALS INDIA, LTD.	Own	
830.6313	Stability to normal & elevated temp., metal, metal ion		TAGROS CHEMICALS INDIA, LTD.	Own	
830.6314	Oxidation/Reduction				3
830.6315	Flammability / Flame Extension				4
830.6316	Explosibility				5
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

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**DATA MATRIX**

Date September 10, 2009			EPA Reg. No./File Symbol 7380f-XXX		Page 2 of 9
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability	CITE-ALL		Pay	
830.6319	Miscibility				6
830.6320	Corrosion Characteristics	CITE-ALL		Pay	
830.6321	Dielectric Breakdown Voltage				7
830.7000	pH		TAGROS CHEMICALS INDIA, LTD.	Own	
830.7050	UV/Visible Spectrum		TAGROS CHEMICALS INDIA, LTD.	Own	
830.7100	Viscosity				8
830.7200	Melting Point/ Melting Range		TAGROS CHEMICALS INDIA, LTD.	Own	
830.7300	Density		TAGROS CHEMICALS INDIA, LTD.	Own	
830.7370	Dissociation Constant				9
830.7570	Octanol/Water Partition Coefficient		TAGROS CHEMICALS INDIA, LTD.	Own	
830.7840/60	Water Solubility		TAGROS CHEMICALS INDIA, LTD.	Own	
830.7950	Vapor Pressure		TAGROS CHEMICALS INDIA, LTD.	Own	
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

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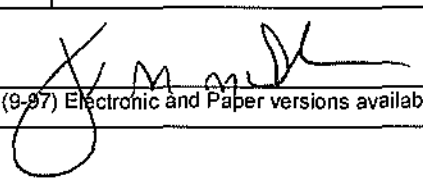
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Date September 10, 2009			EPA Reg. No./File Symbol 73801-XXX		Page 3 of 9
Applicant's/Registrant's Name & Address			Product:		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Remaining data requirements including Acute Toxicity, Ecological Effects, Environmental Fate, and all other generic data requirements required for Non-Ag uses, including task forces.		CITE-ALL	Bonide Products Inc.	Pay	
			Salem, VA		
			Senoret Chemical Co.	Pay	
			Silver Springs, MD		
			Bayer Environmental Science	Pay	
			Research Triangle Park, NC		
			Chase Products	Pay	
			Maywood, IL		
			Spray Drift Task Force	Pay	
			Washington, DC		
			Whitmire Micro-Gen	Pay	
			St. Louis, MO		
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

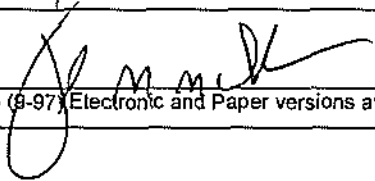
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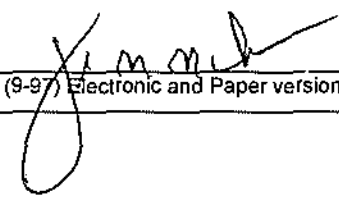
Date September 10, 2009			EPA Reg. No./File Symbol 73801-XXX		Page 4 of 9
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Value Gardens Supply	Pay	
			Saint Joseph, MO		
			Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Southern Agricultural Insecticides	Pay	
			Palmetto, FL		
			The Scotts Company	Pay	
			Marysville, OH		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			Green Light Company	Pay	
			Walnut Creek, CA		
			Zep Manufacturing Co.	Pay	
			Atlanta, GA		
			Bacon Products Co.	Pay	
			Chattanooga, TN		
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

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Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Residential Exposure Joint Venture	Pay	
			Washington, DC		
			Boehringer Ingelheim Vetmedica	Pay	
			Elwood, KS		
			S.C. Johnson & Son	Pay	
			Racine, WI		
			Voluntary Purchasing Group	Pay	
			Plano, TX		
			J.J. Mauget Co.	Pay	
			Woodbridge, VA		
			The Andersons Lawn Fertilizer Div	Pay	
			Maumee, OH		
			AMREP Inc.	Pay	
			Marietta, GA		
			Apollo Industries Inc.	Pay	
			Smyrna, GA		
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

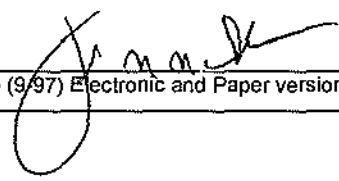
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Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Speer Products Inc.	Pay	
			Memphis, TN		
			Rainbow Technology Corp.	Pay	
			Greeley, CO		
			FtFRA Endangered Species T F	Pay	
			Washington, DC		
			Hoechst Schering Agrevo	Pay	
			Research Triangle Park, NC		
			Aerochem Inc.	Pay	
			Raymond, MS		
			Mystic Chemical Products	Pay	
			Cleveland, OH		
			Drummond American Corp.	Pay	
			Vernon Hills, IL		
			Enforcer Products	Pay	
			Atlanta, GA		
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

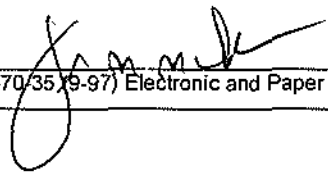
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**DATA MATRIX**

Date September 10, 2009			EPA Reg. No./File Symbol 7380 t-XXX		Page 7 of 9
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Safer Inc.	Pay	
			Lititz, PA		
			Quest Chemocal Corp.	Pay	
			Houston, TX		
			CTX-Cenol Inc.	Pay	
			Miami, FL		
			K-G Packaging Inc.	Pay	
			Hartford, WI		
			Walla Walla Environmental Inc.	Pay	
			Walla Walla, WA		
			Arysta Lifescience North America	Pay	
			Cary, NC		
			Hedley Technologies, USA, Inc.	Pay	
			Grand Junction, CO		
			Bugg Products LLC	Pay	
			Plymouth, MN		
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

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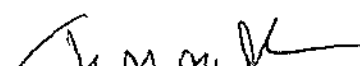
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Date September 10, 2009			EPA Reg. No./File Symbol 73801-XXX		Page 8 of 9
Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Bengal Products, Inc.	Pay	
			Baton Rouge, LA		
			Excel Marketing	Pay	
			Salem, VA		
			Outdoor Residential Exposure TF	Pay	
			Washington, DC		
			Star Horse Products Inc.	Pay	
			Goodyear, AZ		
			Valent Biosciences Corp.	Pay	
			Libertyville, IL		
			Non-Dietary Exposure Task Force	Pay	
			Washington, DC		
			Black Flag Brands	Pay	
			Bedford Heights, OH		
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

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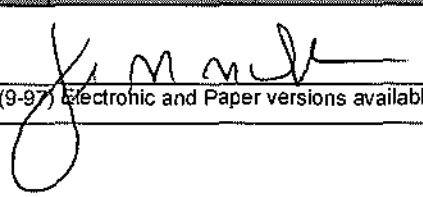
1. **Description of Formulation Process:** Not applicable because the product is a TGA/MP.
2. **Submittal of Samples:** Not required at this time.
3. **Oxidation/Reduction:** Not applicable. Product does not contain oxidizing or reducing agents.
4. **Flammability / Flame Extension:** Not applicable. Product does not contain combustible liquids.
5. **Explosibility:** Not applicable. Product is not potentially explosive.
6. **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
7. **Dielectric Breakdown Voltage:** Not applicable. Product is not intended for use around electrical equipment.
8. **Viscosity:** Not required because product is a solid.
9. **Dissociation Constant:** Not required since there is no acidic or basic functionality in the Deltamethrin molecule. The measurement of pKa is only applicable to molecules which have an acid group (carboxylate, phenol or phosphoric acid for example) or basic group (amine). None of the methrin compounds fall into this class being neutral molecules.

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## DATA MATRIX

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Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. c/o Biologic, Inc. 115 Obfuse Hill Road Brookfield, CT 06804			Dellamethrin Technical		
Ingredient Dellamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			TAGROS CHEMICALS INOIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					1
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					2
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INOIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					3
					4
					5
Signature			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

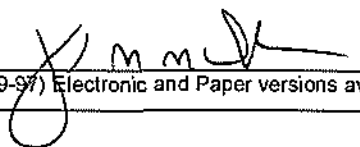


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Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				Pay	
					6
				Pay	
					7
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					8
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
					9
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
			TAGROS CHEMICALS INDIA, LTD.	Own	
Signature 			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009

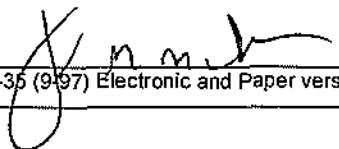
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Applicant's/Registrant's Name & Address			Product		
Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Bonide Products Inc.	Pay	
			Salem, VA		
			Senorel Chemical Co.	Pay	
			Silver Springs, MD		
			Bayer Environmental Science	Pay	
			Research Triangle Park, NC		
			Chase Products	Pay	
			Maywood, IL		
			Spray Drift Task Force	Pay	
			Washington, DC		
			Whitmire Micro-Gen	Pay	
			St. Louis, MO		
Signature 			Name and Title		Date
			Jane M. Miller, Agent		09/10/2009


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**DATA MATRIX**

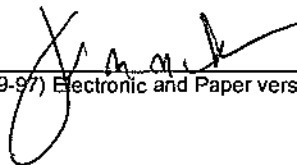
Date September 10, 2009			EPA Reg. No./File Symbol 73801-XXX		Page 4 of 9
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Value Gardens Supply	Pay	
			Saint Joseph, MO		
			Agricultural Reentry Task Force	Pay	
			Washington, DC		
			Southern Agricultural Insecticides	Pay	
			Palmetto, FL		
			The Scotts Company	Pay	
			Marysville, OH		
			Agricultural Handlers Exposure TF	Pay	
			Macon, MO		
			Green Light Company	Pay	
			Walnut Creek, CA		
			Zep Manufacturing Co.	Pay	
			Atlanta, GA		
			Bacon Products Co.	Pay	
			Chattanooga, TN		
Signature 			Name and Title Jane M. Miller, Agent		Date 09/10/2009

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Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obluse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Residential Exposure Joint Venture	Pay	
			Washington, DC		
			Boehringer Ingelheim Vetmedica	Pay	
			Elwood, KS		
			S.C. Johnson & Son	Pay	
			Racine, WI		
			Voluntary Purchasing Group	Pay	
			Plano, TX		
			J.J. Mauget Co.	Pay	
			Woodbridge, VA		
			The Andersons Lawn Fertilizer Div	Pay	
			Maumee, OH		
			AMREP Inc.	Pay	
			Marietta, GA		
			Apollo Industries Inc.	Pay	
			Smyrna, GA		
Signature 			Name and Title Jane M. Miller, Agent		Date 09/10/2009

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Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804	Product Deltamethrin Technical	

Ingredient Deltamethrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Speer Products Inc.	Pay	
			Memphis, TN		
			Rainbow Technology Corp.	Pay	
			Greeley, CO		
			FIFRA Endangered Species T F	Pay	
			Washington, DC		
			Hoechst Schering Agrevo	Pay	
			Research Triangle Park, NC		
			Aerochem Inc.	Pay	
			Raymond, MS		
			Mystic Chemical Products	Pay	
			Cleveland, OH		
			Drummond American Corp.	Pay	
			Vernon Hills, IL		
			Enforcer Products	Pay	
			Atlanta, GA		

Signature 	Name and Title Jane M. Miller, Agent	Date 09/10/2009
--	---	--------------------

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

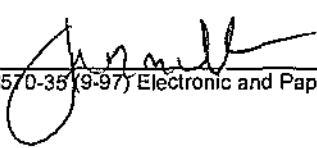
Public File Copy



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

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**DATA MATRIX**

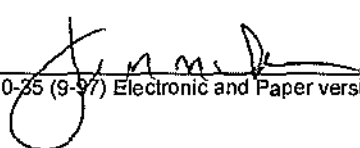
Date September 10, 2009			EPA Reg. No./File Symbol 73801-XXX		Page 7 of 9
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product Dellamethrin Technical		
Ingredient Dellamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Safer Inc.	Pay	
			Lilitz, PA		
			Quest Chemocal Corp.	Pay	
			Houston, TX		
			CTX-Cenol Inc.	Pay	
			Miami, FL		
			K-G Packaging Inc.	Pay	
			Hartford, WI		
			Walla Walla Environmental Inc.	Pay	
			Walla Walla, WA		
			Arysta Lifescience North America	Pay	
			Cary, NC		
			Hedley Technologies, USA, Inc.	Pay	
			Grand Junction, CO		
			Bugg Products LLC	Pay	
			Plymouth, MN		
Signature 			Name and Title Jane M. Miller, Agent		Date 09/10/2009

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

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DATA MATRIX

Date September 10, 2009			EPA Reg. No./File Symbol 73801-XXX		Page 8 of 9
Applicant's/Registrant's Name & Address Tagros Chemicals India, Ltd. Ltd. c/o Biologic, Inc. f15 Obtuse Hill Road Brookfield, CT 06804			Product Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Bengal Products, Inc.	Pay	
			Baton Rouge, LA		
			Excel Marketing	Pay	
			Salem, VA		
			Outdoor Residential Exposure TF	Pay	
			Washington, DC		
			Star Horse Products Inc.	Pay	
			Goodyear, AZ		
			Valent Biosciences Corp.	Pay	
			Libertyville, IL		
			Non-Dietary Exposure Task Force	Pay	
			Washington, DC		
			Black Flag Brands	Pay	
			Bedford Heights, OH		
Signature 			Name and Title Jane M. Miller, Agent		Date 09/10/2009

Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Public File Copy

# Deltamethrin Technical

## An Insecticide for Formulation Purposes Only

Active Ingredient:

Deltamethrin\*:.....98.5%

Inert Ingredients:.....1.5%

TOTAL.....100.0%

\*(1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN

### WARNING

FIRST AID	
<b>If Swallowed:</b>	Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give anything by mouth to an unconscious person.
<b>If Inhaled:</b>	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
<b>If on Skin or Clothing:</b>	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
<b>If in Eyes:</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours, without damage. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.



## ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for the formulation into an insecticide for the following uses:

- 1) In and around non-food areas of residential, industrial, and institutional structures and their immediate surroundings and various modes of transportation.
- 2) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable containers. Metal or Plastic: Do not reuse or refill this container. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Triple rinse as follows:

**Containers larger than 5 gallons:** Empty the remaining contents into formulation equipment a mix tank. Fill the container  $\frac{1}{4}$  full with water. Replace and tighten closures. Tip container on its side and roll back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

**Pressure rinse as follows:** Empty the remaining contents into formulation equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

## CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Tagros Chemicals India, Ltd. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the

control of Tagros Chemicals India, Ltd.. In no case shall Tagros Chemicals India, Ltd. be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. TAGROS CHEMICALS INDIA, LTD. MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

EPA Reg. No. 73801-XX

EPA Est. No. 73801-IND-001

Net Weight:

Manufactured by:  
Tagros Chemicals India, Ltd.  
Jhaver Centre, Rajah Annamalai Building, 4<sup>th</sup> Floor  
59 Marshalls Road  
Egmore, Chennai  
600 008, India

Deltamethrin Technical  
Lawrence A. Miller  
to:  
Shyam Mathur  
03/05/2010 01:18 PM  
Show Details

Hi Shyam:

Further to our telcon this afternoon, please note the corrected CSF and page 27 of the manufacturing process (see attached .pdf file). Please let me know if these are now okay, and if there is anything else you need. Once I have your go ahead, I'll send the appropriate number of hard copies to make the changes. Thanks.

Best Regards,

Larry -

Lawrence A. Miller  
BIOLOGIC, Inc.  
115 Obtuse Hill Road  
Brookfield, CT 06804

Tel: (203) 740-1200  
Fax: (203) 740-1220  
Email: [lmiller@biologicconsulting.com](mailto:lmiller@biologicconsulting.com)

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*agribusiness professionals*

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